

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

This document relates to:

*The County of Summit, Ohio, et al. v.  
Purdue Pharma L.P., et al.*  
Case No. 18-op-45090

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**ENDO HEALTH SOLUTIONS INC. AND ENDO PHARMACEUTICALS INC.  
ANSWER AND AFFIRMATIVE DEFENSES TO  
CORRECTED SECOND AMENDED COMPLAINT AND JURY DEMAND**

Defendants Endo Pharmaceuticals Inc. and Endo Health Solutions Inc. (collectively, “Endo”), by and through counsel, hereby answer Plaintiffs’ Corrected Second Amended Complaint (the “Complaint”).<sup>1</sup> Except to the extent expressly admitted herein, Endo denies each and every allegation of the Complaint, including any allegations contained in its headings or footnotes. With respect to any purported document cited to or quoted from in the Complaint, by providing its answer here, Endo does not admit that the documents are accurate, relevant or admissible in this action, and Endo reserves all objections regarding admissibility. With respect to the specific paragraphs of the Complaint, Endo responds as follows:<sup>2</sup>

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<sup>1</sup> Plaintiffs’ Corrected Second Amended Complaint contains text that Plaintiffs have agreed to delete, as shown by strikethrough. Accordingly, Endo does not provide any response to this text.

<sup>2</sup> Endo is an affiliate of Defendants Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. (collectively, “Par”). To the extent Plaintiffs seek information about Par, Endo refers Plaintiffs to Par’s Answer and Affirmative Defenses to Plaintiffs’ Corrected Second Amended Complaint and Jury Demand.

**ANSWER TO PARAGRAPH 1:** Endo denies that it is liable for any harms or wrongs alleged by Plaintiffs, denies that it engaged in any “false marketing campaign,” denies that it engaged in any of the unlawful conduct alleged by Plaintiffs, and denies the remaining allegations in Paragraph 1 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1 and denies them on that basis.

**ANSWER TO PARAGRAPH 2:** Endo admits that the misuse and abuse of opioids have created a public health crisis and further admits that there is an illegal and illicit drug market facilitating misuse and abuse of opioids. Endo denies any insinuation that it is liable for the opioid abuse crisis and further denies any insinuation that the crisis involves solely the misuse or abuse of prescription opioid medications. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 12 and denies them on that basis.

**ANSWER TO PARAGRAPH 3:** Endo denies that the opioid abuse crisis “arose from” any “deliberate marketing strategy” by Endo, denies that Endo acted “without regard for” people’s lives, and denies the remaining allegations in Paragraph 3 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 3 and denies them on that basis.

**ANSWER TO PARAGRAPH 4:** Endo denies the allegations in Paragraph 4 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 4 and denies them on that basis.

**ANSWER TO PARAGRAPH 5:** Endo admits that brand-name opioid medications include OxyContin, Opana ER, Vicodin, Subsys, and Duragesic (among others) and that generic opioid medications include oxycodone, hydrocodone, or fentanyl products (among others). Endo denies any insinuation that the opioid abuse crisis involves solely the misuse or abuse of prescription opioid medications. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 5 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 6:** The statements of the American Society of Addiction Medicine and the CDC referenced in Paragraph 6 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 6 characterizing the statements. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 6 and denies them on that basis.

**ANSWER TO PARAGRAPH 7:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 7 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 8:** The statements referenced in Paragraph 8 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 8 characterizing those statements and lacks knowledge or information

sufficient to form a belief as to the truth of the statement of Robert Anderson and denies it on that basis.

**ANSWER TO PARAGRAPH 9:** Endo denies that it engaged in any “marketing scheme” or “supply chain scheme,” denies that any of its conduct caused the opioid abuse crisis, and denies the remaining allegations in Paragraph 9 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 9 and denies them on that basis.

**ANSWER TO PARAGRAPH 10:** Endo admits that it has at times marketed and sold certain FDA approved prescription opioid medications. Endo denies that it engaged in a “marketing campaign premised on false or incomplete information,” denies that it was untruthful about the risk of addiction, denies that it “overstated the benefits and trivialized the risk of the long-term use of opioids,” and denies the remaining allegations in Paragraph 10 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 10 to the extent they refer to other Defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 11:** Endo denies the allegations in Paragraph 11 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 11 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 12:** Endo denies the allegations in Paragraph 12 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 12 and denies them on that basis.

**ANSWER TO PARAGRAPH 13:** Endo denies the allegations in Paragraph 13 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 13 and denies them on that basis.

**ANSWER TO PARAGRAPH 14:** Endo denies the allegations in Paragraph 14 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 14 and denies them on that basis.

**ANSWER TO PARAGRAPH 15:** Endo denies the allegations in Paragraph 15 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 15 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 16:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 16 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 17:** Endo admits that illegal pill mills and rogue prescribers have diverted legal drugs for illegal purposes multiple steps down the otherwise legitimate supply chain. Endo denies that it has provided “knowing support,” “tacit support,” or willfully turned a blind eye to illegal pill mills and rogue prescribers and denies the remaining

allegations in the third sentence of Paragraph 17 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 17 and denies them on that basis.

**ANSWER TO PARAGRAPH 18:** The statements of the CDC and the U.S. Surgeon General referenced in Paragraph 18 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 18 characterizing these statements. Endo denies the allegations in Paragraph 18 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 18 and denies them on that basis.

**ANSWER TO PARAGRAPH 19:** The statement of the CDC director referenced in Paragraph 19 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 19 characterizing the statement. Endo denies the remaining allegations in Paragraph 19.

**ANSWER TO PARAGRAPH 20:** Endo denies the allegations in Paragraph 20 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 20 and denies them on that basis.

**ANSWER TO PARAGRAPH 21:** Endo denies the allegations in Paragraph 21 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 21 and denies them on that basis.

**ANSWER TO PARAGRAPH 22:** Endo denies the allegations in Paragraph 22 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 22 of the Complaint to the extent they refer to other Defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 23:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 23 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 24:** Endo denies that it is responsible for or has caused the opioid abuse crisis, denies that Endo violated any of the alleged laws, denies that any factual or legal basis exists for any of the claims against Endo in this action, and denies that Plaintiffs are entitled to any relief.

#### **JURISDICTION AND VENUE**

**ANSWER TO PARAGRAPH 25:** The allegations in Paragraph 25 of the Complaint contain legal conclusions or arguments that require no answer. Further, 28 U.S.C § 1331, 1367 and 18 U.S.C. § 1961 *et seq.*, speak for themselves, and no answer is necessary to Plaintiffs' allegations characterizing those provisions.

**ANSWER TO PARAGRAPH 26:** The allegations in Paragraph 26 of the Complaint contain legal conclusions or arguments that require no answer.

**ANSWER TO PARAGRAPH 27:** The allegations in Paragraph 27 of the Complaint contain legal conclusions or arguments that require no answer.

**PARTIES**

**ANSWER TO PARAGRAPH 28:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 28 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 29:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 29 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 30:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 30 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 31:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 31 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 32:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo

lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 32 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 33:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 33 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 34:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 34 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 35:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 35 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 36:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 36 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 37:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo

lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 37 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 38:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 38 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 39:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 39 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 40:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 40 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 41:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 41 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 42:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo

lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 42 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 43:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 43 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 44:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 44 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 45:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 45 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 46:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 46 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 47:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo

lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 47 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 48:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 48 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 49:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 49 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 50:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 50 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 51:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 51 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 52:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 52 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 53:** Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiffs are entitled to any relief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 53 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 54:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 54 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 55:** Paragraph 55 of the Complaint requires no response.

**ANSWER TO PARAGRAPH 56:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 56 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 57:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 57 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 58:** The allegations in Paragraph 58 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies that Plaintiffs may recover for public nuisance in this action and denies the allegations in Paragraph 58 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 58 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 59:** The allegations in Paragraph 59 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 59 to the extent they refer to Endo and its purported conduct and denies any allegation that Plaintiffs' alleged damages are attributable to Endo. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 59 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 60:** The allegations in Paragraph 60 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies that it engaged in any wrongful and/or unlawful conduct and denies that Plaintiffs are entitled to the relief they seek. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 60 of the Complaint to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 61:** The allegations in Paragraph 61 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies that Plaintiffs have standing and denies the remaining allegations in Paragraph 61 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 61 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 62:** The allegations in Paragraph 62 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies that Plaintiffs have standing and denies the remaining allegations in Paragraph 62 to the extent they refer to Endo and its purported conduct. Moreover, the statutes

referenced in Paragraph 62 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 62 characterizing the statutes. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 62 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 63:** Endo admits that it has marketed and sold certain prescription opioid medications, that at times it promoted certain opioid medications, and that it has provided information about the risks and benefits of its opioid medications, including through the FDA-approved labels. Endo denies any insinuation that it failed to warn of the risks associated with the use of its prescription opioid medications, denies that it failed to comply with applicable laws, and denies the remaining allegations in Paragraph 63 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 63 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 64:** Paragraph 64 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64 and denies them on that basis.

**ANSWER TO PARAGRAPH 65:** Paragraph 65 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65 and denies them on that basis.

**ANSWER TO PARAGRAPH 66:** Paragraph 66 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 66 and denies them on that basis.

**ANSWER TO PARAGRAPH 67:** Paragraph 67 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67 and denies them on that basis.

**ANSWER TO PARAGRAPH 68:** Paragraph 68 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68 and denies them on that basis.

**ANSWER TO PARAGRAPH 69:** Paragraph 69 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 69 and denies them on that basis.

**ANSWER TO PARAGRAPH 70:** Paragraph 70 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70 and denies them on that basis.

**ANSWER TO PARAGRAPH 71:** Paragraph 71 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71 and denies them on that basis.

**ANSWER TO PARAGRAPH 72:** Paragraph 72 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72 and denies them on that basis.

**ANSWER TO PARAGRAPH 73:** Plaintiffs have agreed to delete the entirety of Paragraph 73 from the Complaint. Accordingly, Endo does not provide any response to this paragraph.

**ANSWER TO PARAGRAPH 74:** Paragraph 74 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74 and denies them on that basis.

**ANSWER TO PARAGRAPH 75:** Paragraph 75 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75 and denies them on that basis.

**ANSWER TO PARAGRAPH 76:** Paragraph 76 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond,

Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76 and denies them on that basis.

**ANSWER TO PARAGRAPH 77:** Paragraph 77 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77 and denies them on that basis.

**ANSWER TO PARAGRAPH 78:** Paragraph 78 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 78 and denies them on that basis.

**ANSWER TO PARAGRAPH 79:** Paragraph 79 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 79 and denies them on that basis.

**ANSWER TO PARAGRAPH 80:** Paragraph 80 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 80 and denies them on that basis.

**ANSWER TO PARAGRAPH 81:** Paragraph 81 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond,

Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81 and denies them on that basis.

**ANSWER TO PARAGRAPH 82:** Paragraph 82 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82 and denies them on that basis.

**ANSWER TO PARAGRAPH 83:** Paragraph 83 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83 and denies them on that basis.

**ANSWER TO PARAGRAPH 84:** Paragraph 84 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 84 and denies them on that basis.

**ANSWER TO PARAGRAPH 85:** Paragraph 85 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85 and denies them on that basis.

**ANSWER TO PARAGRAPH 86:** Paragraph 86 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond,

Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86 and denies them on that basis.

**ANSWER TO PARAGRAPH 87:** Paragraph 87 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87 and denies them on that basis.

**ANSWER TO PARAGRAPH 88:** Paragraph 88 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88 and denies them on that basis.

**ANSWER TO PARAGRAPH 89:** Endo admits that Endo Health Solutions Inc. was incorporated under the laws of the State of Delaware and is based in Malvern, Pennsylvania. Except as expressly admitted, Endo denies the allegations in Paragraph 89 of the Complaint.

**ANSWER TO PARAGRAPH 90:** Endo admits that Endo Pharmaceuticals Inc. (“EPI”) was incorporated under the laws of the State of Delaware and is based in Malvern, Pennsylvania. Except as expressly admitted, Endo denies the allegations in Paragraph 90 of the Complaint.

**ANSWER TO PARAGRAPH 91:** Endo admits that Par Pharmaceutical, Inc. is a wholly-owned subsidiary of Par Pharmaceutical Companies, Inc.; that Par Pharmaceutical Companies, Inc. was incorporated under the laws of the State of Delaware; and that Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. are based in Chestnut Ridge, New York. Endo further admits that Endo International plc acquired Par Pharmaceutical, Inc. and Par

Pharmaceutical Companies, Inc. in September 2015 and that Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. are operating companies of Endo International plc. Endo admits that Endo Pharmaceuticals Inc. has at various times sold prescription opioid medications, including Opana ER, Opana, Percodan, and Percocet. Endo admits that an affiliate of Endo has at various times sold generic prescription opioid medications. Except as expressly admitted, Endo denies the allegations in Paragraph 91 of the Complaint.

**ANSWER TO PARAGRAPH 92:** Endo denies the allegations in Paragraph 92 of the Complaint.

**ANSWER TO PARAGRAPH 93:** Endo admits that Endo Health Solutions Inc. reported \$3.03 billion in total revenues in 2012 and that from 2010 to 2013 it reported approximately \$1.15 billion of revenue from Opana ER. Endo admits that an affiliate of Endo has at various times sold generic prescription opioid medications. Except as expressly admitted, Endo denies the allegations in Paragraph 93 of the Complaint.

**ANSWER TO PARAGRAPH 94:** Endo admits that in June of 2017, the FDA requested that reformulated Opana ER be voluntarily removed from the market. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 94 and denies them on that basis.

**ANSWER TO PARAGRAPH 95:** Paragraph 95 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95 and denies them on that basis.

**ANSWER TO PARAGRAPH 96:** Paragraph 96 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96 and denies them on that basis.

**ANSWER TO PARAGRAPH 97:** Paragraph 97 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97 and denies them on that basis.

**ANSWER TO PARAGRAPH 98:** Paragraph 98 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98 and denies them on that basis.

**ANSWER TO PARAGRAPH 99:** Paragraph 99 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99 and denies them on that basis.

**ANSWER TO PARAGRAPH 100:** Paragraph 100 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100 and denies them on that basis.

**ANSWER TO PARAGRAPH 101:** Paragraph 101 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101 and denies them on that basis.

**ANSWER TO PARAGRAPH 102:** Paragraph 102 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102 and denies them on that basis.

**ANSWER TO PARAGRAPH 103:** Paragraph 103 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103 and denies them on that basis.

**ANSWER TO PARAGRAPH 104:** Paragraph 104 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104 and denies them on that basis.

**ANSWER TO PARAGRAPH 105:** Paragraph 105 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105 and denies them on that basis.

**ANSWER TO PARAGRAPH 106:** Paragraph 106 of the Complaint does not require a response. To the extent a response is necessary, Endo denies that any factual or legal basis exists for any of the claims against Endo, either individually or collectively with any other named Defendant, in this action or that Plaintiffs are entitled to any relief whatsoever.

**ANSWER TO PARAGRAPH 107:** Paragraph 107 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107 and denies them on that basis.

**ANSWER TO PARAGRAPH 108:** Paragraph 108 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108 and denies them on that basis.

**ANSWER TO PARAGRAPH 109:** Paragraph 109 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109 and denies them on that basis.

**ANSWER TO PARAGRAPH 110:** Paragraph 110 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110 and denies them on that basis.

**ANSWER TO PARAGRAPH 111:** Paragraph 111 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111 and denies them on that basis.

**ANSWER TO PARAGRAPH 112:** Paragraph 112 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112 and denies them on that basis.

**ANSWER TO PARAGRAPH 113:** Paragraph 113 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113 and denies them on that basis.

**ANSWER TO PARAGRAPH 114:** Paragraph 114 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114 and denies them on that basis.

**ANSWER TO PARAGRAPH 115:** Paragraph 115 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115 and denies them on that basis.

**ANSWER TO PARAGRAPH 116:** Paragraph 116 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116 and denies them on that basis.

**ANSWER TO PARAGRAPH 117:** Paragraph 117 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117 and denies them on that basis.

**ANSWER TO PARAGRAPH 118:** Paragraph 118 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118 and denies them on that basis.

**ANSWER TO PARAGRAPH 119:** Paragraph 119 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119 and denies them on that basis.

**ANSWER TO PARAGRAPH 120:** Paragraph 120 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120 and denies them on that basis.

**ANSWER TO PARAGRAPH 121:** Paragraph 121 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121 and denies them on that basis.

**ANSWER TO PARAGRAPH 122:** Paragraph 122 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122 and denies them on that basis.

**ANSWER TO PARAGRAPH 123:** Paragraph 123 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123 and denies them on that basis.

**ANSWER TO PARAGRAPH 124:** Paragraph 124 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124 and denies them on that basis.

**ANSWER TO PARAGRAPH 125:** Paragraph 125 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125 and denies them on that basis.

**ANSWER TO PARAGRAPH 126:** Paragraph 126 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126 and denies them on that basis.

**ANSWER TO PARAGRAPH 127:** Paragraph 127 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127 and denies them on that basis.

**ANSWER TO PARAGRAPH 128:** Paragraph 128 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128 and denies them on that basis.

**ANSWER TO PARAGRAPH 129:** Endo denies the allegations in Paragraph 129 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 129 of the Complaint to the extent they refer to other defendants and denies them on that basis.

### **FACTUAL ALLEGATIONS**

**ANSWER TO PARAGRAPH 130:** Endo admits that opioid medications are a class of drugs that can bind to opioid receptors and include natural, synthetic and semi-synthetic opioids. Endo further admits that opioids may produce both analgesic and euphoric effects in users and

that respiratory depression has been reported with the use of opioids. Except as expressly admitted, Endo denies the allegations in Paragraph 130 of the Complaint.

**ANSWER TO PARAGRAPH 131:** Endo admits that morphine, codeine, and thebaine are opioids. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 131 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 132:** The statement attributed to Hamilton Wright in Paragraph 132 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 132 characterizing the statement. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 132 and denies them on that basis.

**ANSWER TO PARAGRAPH 133:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 134:** Endo admits that heroin and opium are classified as illicit drugs. Except as expressly admitted, Endo denies the allegations in Paragraph 134 of the Complaint.

**ANSWER TO PARAGRAPH 135:** Endo admits that opioids expose users to the risks of addiction, abuse, and misuse and that certain opioid medications have been regulated as controlled substances. Except as expressly admitted, Endo lacks knowledge or information

sufficient to form a belief as to the truth of the remaining allegations in Paragraph 135 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 136:** Endo admits that Endo Pharmaceuticals Inc. has at various times marketed and sold the prescription opioid medications Percodan (oxycodone hydrochloride and aspirin) and Percocet (oxycodone hydrochloride and acetaminophen). Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 136 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 137:** Paragraph 137 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137 and denies them on that basis.

**ANSWER TO PARAGRAPH 138:** The CDC statement and study referred to Paragraph 138 of the Complaint speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 138 characterizing them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 138 and denies them on that basis.

**ANSWER TO PARAGRAPH 139:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 139 and denies them on that basis.

**ANSWER TO PARAGRAPH 140:** Endo denies the allegations in Paragraph 140 of the Complaint to the extent they refer to Endo or its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 140 and denies them on that basis.

**ANSWER TO PARAGRAPH 141:** Endo denies the allegations in Paragraph 141 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 141 and denies them on that basis.

**ANSWER TO PARAGRAPH 142:** Endo admits that Opana ER was generally intended for administration at a frequency of every 12 hours. Endo admits that opioid medications are also available in short-acting formulations. Except as expressly admitted, Endo denies the allegations in Paragraph 142 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 143:** Endo acknowledges that some patients can develop a tolerance to and physical dependence on opioids and that respiratory depression has been reported with the use of opioids. Except as expressly admitted, Endo denies the allegations in Paragraph 146 of the Complaint.

**ANSWER TO PARAGRAPH 144:** Endo acknowledges that some patients can experience withdrawal symptoms after abrupt discontinuation or a significant dosage reduction of opioids. Except as expressly admitted, Endo denies the allegations in Paragraph 145 of the Complaint.

**ANSWER TO PARAGRAPH 145:** Endo denies the allegations in Paragraph 145 of the Complaint.

**ANSWER TO PARAGRAPH 146:** Endo denies the allegations in Paragraph 146 of the Complaint and the headings preceding Paragraph 146 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 146 and the headings preceding Paragraph 146 and denies them on that basis.

**ANSWER TO PARAGRAPH 147:** Paragraph 147 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147 and denies them on that basis.

**ANSWER TO PARAGRAPH 148:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 149:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 150:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 151:** Endo admits that it has at times taken into account prescribers' specialties and prescription data to inform its detailing decisions. Except as expressly admitted, Endo denies the allegations in Paragraph 151 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 151 and denies them on that basis.

**ANSWER TO PARAGRAPH 152:** Paragraph 152 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 153:** Paragraph 153 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153 and denies them on that basis.

**ANSWER TO PARAGRAPH 154:** Paragraph 154 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154 and denies them on that basis.

**ANSWER TO PARAGRAPH 155:** Paragraph 155 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155 and denies them on that basis.

**ANSWER TO PARAGRAPH 156:** Paragraph 156 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156 and denies them on that basis.

**ANSWER TO PARAGRAPH 157:** Paragraph 157 of the Complaint, including the graph referred to in that paragraph, concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 157 and denies them on that basis.

**ANSWER TO PARAGRAPH 158:** Paragraph 158 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158 and denies them on that basis.

**ANSWER TO PARAGRAPH 159:** Paragraph 159 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159 and denies them on that basis.

**ANSWER TO PARAGRAPH 160:** Paragraph 160 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160 and denies them on that basis.

**ANSWER TO PARAGRAPH 161:** Paragraph 161 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161 and denies them on that basis..

**ANSWER TO PARAGRAPH 162:** Paragraph 162 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162 and denies them on that basis.

**ANSWER TO PARAGRAPH 163:** Paragraph 163 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163 and denies them on that basis.

**ANSWER TO PARAGRAPH 164:** Endo admits that Endo Pharmaceuticals Inc. has marketed and sold certain prescription opioid medications at various times. Except as expressly admitted, Endo denies the allegations in Paragraph 164 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 165:** Endo admits that Endo Pharmaceuticals Inc. has marketed and sold certain opioid medications at various times, including Opana ER (oxymorphone hydrochloride extended-release), Opana (oxymorphone hydrochloride immediate-release), Percodan, Percocet, and generic oxycodone. Endo denies that it sold oxymorphone beginning in 1959 under the trade name Numorphan, denies that Endo withdrew oral Numorphan from the market in 1979, and denies the remaining allegations in Paragraph 165 of the Complaint to the extent they refer to Endo and its purported conduct. Moreover, the National Institute on Drug Abuse report cited in Paragraph 165 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 165 characterizing the report. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 165 and denies them on that basis.

**ANSWER TO PARAGRAPH 166:** Endo denies the allegations in Paragraph 166 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 166 and denies them on that basis.

**ANSWER TO PARAGRAPH 167:** Endo admits that Endo Pharmaceuticals Inc. previously marketed Opana ER and Opana beginning in 2006, and that Endo submitted additional clinical trials supporting the new drug applications ("NDAs") for Opana ER and Opana subsequent to Endo's initial filing of those NDAs. Those clinical trials and the NDAs speak for themselves and no response is necessary to the allegations in Paragraph 167 characterizing them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 167 characterizing the trials. Endo denies the remaining allegations in Paragraph 167.

**ANSWER TO PARAGRAPH 168:** Endo admits that on June 8, 2017, the FDA requested that reformulated Opana ER be removed from the market. Endo further admits that on July 6, 2017, Endo announced that it would voluntarily remove Opana ER from the market. Except as expressly admitted, Endo denies the allegations in Paragraph 168 of the Complaint to the extent they refer to Endo and its purported conduct. Moreover, the FDA statement in Paragraph 168 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 168 characterizing the statement. The remaining allegations in Paragraph 168 concern defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168 to the extent they refer to another defendant and denies them on that basis.

**ANSWER TO PARAGRAPH 169:** Paragraph 169 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169 and denies them on that basis.

**ANSWER TO PARAGRAPH 170:** Endo admits that from 2010 to 2013 Endo Health Solutions Inc. reported approximately \$1.15 billion of revenue from Opana ER. Endo denies the remaining allegations in Paragraph 170 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 171:** The allegations in Paragraph 171 of the Complaint and the heading preceding it contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 171 and the heading preceding it to the extent they refer to Endo and its purported conduct.

**ANSWER TO PARAGRAPH 172:** The allegations in Paragraph 172 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies that its actions “created, perpetuated or maintained” the opioid abuse crisis and denies the remaining allegations in Paragraph 172 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 172 and denies them on that basis.

**ANSWER TO PARAGRAPH 173:** The allegations in Paragraph 173 of the Complaint contain legal conclusions and arguments that require no answer. To the extent an answer is required, Endo admits that a pharmaceutical company should provide accurate labeling, marketing and promotional materials for the FDA-approved medications that it sells. Endo further admits that controlled substances should be distributed and dispensed in accordance with applicable federal and state laws. Endo denies Plaintiffs’ characterization of what the law requires and denies the remaining allegations in Paragraph 173 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 173 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 174:** Endo denies the allegations in Paragraph 174 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported

conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 174 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 175:** Endo denies the allegations in Paragraph 175 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 175 and denies them on that basis.

**ANSWER TO PARAGRAPH 176:** Endo denies the allegations in Paragraph 176 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 177:** Endo denies that it made any misrepresentation and denies the remaining allegations in Paragraph 177 of the Complaint, the heading preceding it, and all Subparts thereto to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 177, the heading preceding it, and all Subparts thereto to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 178:** Endo denies the allegations in Paragraph 178 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 178 and denies them on that basis.

**ANSWER TO PARAGRAPH 179:** The first, fourth, and fifth sentences of Paragraph 179 of the Complaint purport to describe Plaintiffs' organization of the Complaint and require no response. To the extent a response is required, Endo denies that it made any misrepresentations or deceptive statements and denies Plaintiffs' characterizations of Endo's marketing and conduct. Endo further denies the allegations in Paragraph 179 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 179 and denies them on that basis.

**ANSWER TO PARAGRAPH 180:** Endo denies the allegations in Paragraph 180 of the Complaint and the heading preceding it, as stated, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 180 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 181:** Endo denies that it made false statements and denies the remaining allegations in Paragraph 181 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 181 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 182:** The FDA statement and CDC Guidelines cited in Paragraph 182 speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 182 characterizing them. Endo denies the remaining allegations in Paragraph 182 of the Complaint.

**ANSWER TO PARAGRAPH 183:** Endo denies the allegations in Paragraph 183 of the Complaint to the extent they refer to Endo and its purported conduct. The remaining allegations in Paragraph 183 of the Complaint, and the heading preceding it, concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183 and the heading preceding it concerning another defendant and denies them on that basis.

**ANSWER TO PARAGRAPH 184:** The letter quoted in Paragraph 184 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 184 characterizing the letter.

**ANSWER TO PARAGRAPH 185:** The statement referenced in Paragraph 185 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 184 characterizing the statement.

**ANSWER TO PARAGRAPH 186:** Endo denies the allegations in Paragraph 186 of the Complaint to the extent they refer to Endo and its purported conduct. The statement referenced in Paragraph 186 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 184 characterizing the statement. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 187:** Paragraph 187 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187 and denies them on that basis.

**ANSWER TO PARAGRAPH 188:** Endo denies the allegations in Paragraph 188 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 188 to the extent they refer to other defendants and denies them on that basis. Moreover, the letter quoted in Paragraph 188 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 188 characterizing the letter.

**ANSWER TO PARAGRAPH 189:** The statement referenced in Paragraph 189 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 189 characterizing the statement.

**ANSWER TO PARAGRAPH 190:** Paragraph 190 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190 and denies them on that basis.

**ANSWER TO PARAGRAPH 191:** Paragraph 191 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 191 and denies them on that basis.

**ANSWER TO PARAGRAPH 192:** Paragraph 192 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192 and denies them on that basis.

**ANSWER TO PARAGRAPH 193:** Paragraph 193 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193 and denies them on that basis.

**ANSWER TO PARAGRAPH 194:** Paragraph 194 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 194 and denies them on that basis.

**ANSWER TO PARAGRAPH 195:** Paragraph 195 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 195 and denies them on that basis.

**ANSWER TO PARAGRAPH 196:** Paragraph 196 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 196 and denies them on that basis.

**ANSWER TO PARAGRAPH 197:** Paragraph 197 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 197 and denies them on that basis.

**ANSWER TO PARAGRAPH 198:** Paragraph 198 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 198 and denies them on that basis.

**ANSWER TO PARAGRAPH 199:** Paragraph 199 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199 and denies them on that basis.

**ANSWER TO PARAGRAPH 200:** Paragraph 200 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 200 and denies them on that basis.

**ANSWER TO PARAGRAPH 201:** Paragraph 201 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201 and denies them on that basis.

**ANSWER TO PARAGRAPH 202:** Paragraph 202 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 202 and denies them on that basis.

**ANSWER TO PARAGRAPH 203:** Endo denies the allegations in Paragraph 203 of the Complaint and the heading preceding it.

**ANSWER TO PARAGRAPH 204:** The website [www.opana.com](http://www.opana.com) referenced in Paragraph 204 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 204 characterizing the website.

**ANSWER TO PARAGRAPH 205:** Endo's training materials speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 205 characterizing them. Endo denies the remaining allegations in Paragraph 205 of the Complaint.

**ANSWER TO PARAGRAPH 206:** Endo admits that it has at times provided independent educational grant funding to APF and NIPC. The website [www.PainKnowledge.com](http://www.PainKnowledge.com) speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations

in Paragraph 206 characterizing the website. Endo denies the remaining allegations in Paragraph 206 of the Complaint and the footnote to Paragraph 206.

**ANSWER TO PARAGRAPH 207:** The website *www.PainAction.com* speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 207 of the Complaint characterizing the website. Endo denies the remaining allegations in Paragraph 207 of the Complaint.

**ANSWER TO PARAGRAPH 208:** Endo admits that it has at times provided independent educational grant funding to NIPC. The brochure quoted in Paragraph 208 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 208 characterizing brochure. Endo denies the remaining allegations in Paragraph 208.

**ANSWER TO PARAGRAPH 209:** Endo admits that it made available at various times a pamphlet entitled *Understanding Your Pain: Taking Oral Opioid Analgesics*. The pamphlet speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 209 of the Complaint characterizing the pamphlet and denies the remaining allegations in Paragraph 209.

**ANSWER TO PARAGRAPH 210:** Endo admits that it made available a pamphlet titled *Living With Someone With Chronic Pain*. The pamphlet and the *www.opana.com* website speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 210 characterizing the pamphlet and website.

**ANSWER TO PARAGRAPH 211:** The publication *Pain: Opioid Therapy* referenced in Paragraph 211 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterizations of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 211 characterizing the publication and denies the remaining allegations in Paragraph 211 of the Complaint.

**ANSWER TO PARAGRAPH 212:** Paragraph 212 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 213:** Paragraph 213 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 213 and denies them on that basis.

**ANSWER TO PARAGRAPH 214:** Paragraph 214 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 214 and denies them on that basis.

**ANSWER TO PARAGRAPH 215:** Paragraph 215 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 215 and denies them on that basis.

**ANSWER TO PARAGRAPH 216:** Paragraph 216 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216 and denies them on that basis.

**ANSWER TO PARAGRAPH 217:** Paragraph 217 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 217 and denies them on that basis.

**ANSWER TO PARAGRAPH 218:** Paragraph 218 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 218 and denies them on that basis.

**ANSWER TO PARAGRAPH 219:** Paragraph 219 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 219 and denies them on that basis.

**ANSWER TO PARAGRAPH 220:** Paragraph 220 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 220 and denies them on that basis.

**ANSWER TO PARAGRAPH 221:** Paragraph 221 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 221 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 222:** Paragraph 222 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 222 and denies them on that basis.

**ANSWER TO PARAGRAPH 223:** Paragraph 223 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 223 and denies them on that basis.

**ANSWER TO PARAGRAPH 224:** Paragraph 224 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 224 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 225:** Paragraph 225 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 225 and denies them on that basis.

**ANSWER TO PARAGRAPH 226:** Paragraph 226 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 226 and denies them on that basis.

**ANSWER TO PARAGRAPH 227:** Paragraph 227 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 227 and denies them on that basis.

**ANSWER TO PARAGRAPH 228:** Paragraph 228 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 228 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 229:** Paragraph 229 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 229 and denies them on that basis.

**ANSWER TO PARAGRAPH 230:** Paragraph 230 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230 and denies them on that basis.

**ANSWER TO PARAGRAPH 231:** Paragraph 231 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 231 and denies them on that basis.

**ANSWER TO PARAGRAPH 232:** Endo denies the allegations in Paragraph 232 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 232 and denies them on that basis.

**ANSWER TO PARAGRAPH 233:** Endo denies the allegations in Paragraph 233 of the Complaint and the heading preceding it, as stated, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 233 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 234:** Paragraph 234 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234 and denies them on that basis.

**ANSWER TO PARAGRAPH 235:** Paragraph 235 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235 and denies them on that basis.

**ANSWER TO PARAGRAPH 236:** Paragraph 236 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 236 and denies them on that basis.

**ANSWER TO PARAGRAPH 237:** Paragraph 237 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 237 and denies them on that basis.

**ANSWER TO PARAGRAPH 238:** Paragraph 238 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238 and denies them on that basis.

**ANSWER TO PARAGRAPH 239:** Endo admits that it provided an independent educational grant to support a 2007 supplement *Pain Management Dilemmas in Primary Care* that appeared in the *Journal of Family Practice*. Endo admits that one author of the supplement later participated in Endo speakers' programs. The supplement speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 239 of the Complaint characterizing the supplement. Endo denies the remaining allegations in Paragraph 239 of the Complaint.

**ANSWER TO PARAGRAPH 240:** Endo denies the allegations in the first sentence of Paragraph 240 of the Complaint to the extent they refer to Endo and its purported conduct and denies the remaining allegations in Paragraph 240. Endo lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 240 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 241:** Endo denies the allegations in Paragraph 241 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Moreover, the study referenced in Paragraph 241 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 241 characterizing the study. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 241 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 242:** Endo denies the allegations in Paragraph 242 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 242 these to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 243:** Endo admits that it provided independent educational grant funding to the Federation of State Medical Boards in connection with *Responsible Opioid Prescribing*. *Responsible Opioid Prescribing* speaks for itself and no response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 243 of the Complaint characterizing the publication. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 243 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 244:** Paragraph 244 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 244 and denies them on that basis.

**ANSWER TO PARAGRAPH 245:** Paragraph 245 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 245 and denies them on that basis.

**ANSWER TO PARAGRAPH 246:** Endo denies the allegations in the first sentence of Paragraph 246. The training module referred to in Paragraph 246 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 246 characterizing module.

**ANSWER TO PARAGRAPH 247:** Endo admits that it at times provided independent educational grant funding to NIPC. Except as expressly admitted, Endo denies the allegations in Paragraph 247 of the Complaint. Moreover, the CME materials speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 247 characterizing them.

**ANSWER TO PARAGRAPH 248:** Endo admits that in March 2016, it executed an Assurance of Discontinuation ("AOD") with the New York Attorney General. The AOD speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a

further response is necessary, Endo denies the allegations in Paragraph 248 of the Complaint characterizing the AOD. Endo denies the remaining allegations in Paragraph 248.

**ANSWER TO PARAGRAPH 249:** Paragraph 249 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 249 and denies them on that basis.

**ANSWER TO PARAGRAPH 250:** Paragraph 250 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 250 and denies them on that basis.

**ANSWER TO PARAGRAPH 251:** The CDC Guideline and Dr. Webster quote referenced in Paragraph 251 of the Complaint speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 251 of the Complaint characterizing them.

**ANSWER TO PARAGRAPH 252:** Endo denies the allegations in Paragraph 252 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 252 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 253:** Endo admits that it has at times provided funding for CMEs. Endo further admits that some patients can experience withdrawal symptoms after an

abrupt discontinuation of opioids and that signs and symptoms of withdrawal may include, but are not limited to, anxiety. The CME *Persistent Pain in the Older Adult* speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 253 of the Complaint characterizing the CME. Except as expressly admitted, Endo denies the allegations in Paragraph 253 of the Complaint.

**ANSWER TO PARAGRAPH 254:** Paragraph 254 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 254 and denies them on that basis.

**ANSWER TO PARAGRAPH 255:** Endo denies that it made misrepresentations and denies the remaining allegations in Paragraph 255 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 255 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 256:** Endo denies the allegations in Paragraph 256 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 256 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 257:** Endo admits that some patients can develop a tolerance to opioids. Except as expressly admitted, Endo denies the allegations in Paragraph 257

of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 257 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 258:** Paragraph 258 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 258 and denies them on that basis.

**ANSWER TO PARAGRAPH 259:** Endo denies the allegations in the first sentence of Paragraph 259 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 259 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 260:** Endo denies that it made misrepresentations and denies the remaining allegations in Paragraph 260 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 260 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 261:** Paragraph 261 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 261 and denies them on that basis.

**ANSWER TO PARAGRAPH 262:** The website *www.painknowledge.com* cited in Paragraph 262 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 262 characterizing the website. Endo denies the remaining allegations in Paragraph 262 of the Complaint.

**ANSWER TO PARAGRAPH 263:** Endo admits that it made available a pamphlet entitled *Understanding Your Pain: Taking Oral Opioid Analgesics*. That pamphlet speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 263 of the Complaint characterizing the pamphlet. Except as expressly admitted, Endo denies the allegations in Paragraph 263.

**ANSWER TO PARAGRAPH 264:** Paragraph 264 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 264 and denies them on that basis.

**ANSWER TO PARAGRAPH 265:** Paragraph 265 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 265 and denies them on that basis.

**ANSWER TO PARAGRAPH 266:** Paragraph 266 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 266 and denies them on that basis.

**ANSWER TO PARAGRAPH 267:** Endo denies the allegations in Paragraph 267 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 267 to the extent they refer to other defendants and denies them on that basis. Moreover, the FDA statement and Veterans Health Administration study speak for themselves, no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 267 characterizing them.

**ANSWER TO PARAGRAPH 268:** Endo denies the allegations in Paragraph 268 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 268 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 269:** Paragraph 269 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 269 and denies them on that basis.

**ANSWER TO PARAGRAPH 270:** Paragraph 270 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 270 and denies them on that basis.

**ANSWER TO PARAGRAPH 271:** Paragraph 271 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 271 and denies them on that basis.

**ANSWER TO PARAGRAPH 272:** Paragraph 272 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 272 and denies them on that basis.

**ANSWER TO PARAGRAPH 273:** Paragraph 273 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273 and denies them on that basis.

**ANSWER TO PARAGRAPH 274:** The website *www.opana.com* and the pamphlet referenced in Paragraph 274 of the Complaint speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 274 characterizing those materials.

**ANSWER TO PARAGRAPH 275:** Endo admits that it provided some independent educational grant funding relating to *Responsible Opioid Prescribing*. Endo admits that it purchased copies of the book *Responsible Opioid Prescribing* and that it made copies of the book available to appropriate physicians. *Responsible Opioid Prescribing* speaks for itself and no response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 275 of the Complaint characterizing the

publication. Except as expressly admitted, Endo denies the allegations in Paragraph 275 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 275 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 276:** Paragraph 276 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276 and denies them on that basis.

**ANSWER TO PARAGRAPH 277:** Paragraph 277 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 277 and denies them on that basis.

**ANSWER TO PARAGRAPH 278:** Endo admits that it has at times provided independent educational grant funding to NIPC. The website *www.painknowledge.com* speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 278 of the Complaint characterizing the website. Except as expressly admitted, Endo denies the allegations in Paragraph 278.

**ANSWER TO PARAGRAPH 279:** Endo admits that it has at times provided independent educational grant funding to NIPC. The CME cited in Paragraph 279 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of

it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 279 characterizing the CME. Endo denies the remaining allegations in Paragraph 279.

**ANSWER TO PARAGRAPH 280:** Paragraph 280 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280 and denies them on that basis.

**ANSWER TO PARAGRAPH 281:** Endo denies the allegations in Paragraph 281 of the Complaint to the extent they refer to Endo and its purported conduct. The FDA letters and CDC Guidelines cited in Paragraph 281 and the footnotes to Paragraph 281 speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 281 characterizing them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 281 and denies them on that basis.

**ANSWER TO PARAGRAPH 282:** The studies cited in Paragraph 282 of the Complaint and the footnote to Paragraph 282 speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 282 characterizing them. Endo denies the remaining allegations in Paragraph 282.

**ANSWER TO PARAGRAPH 283:** The CDC Guidelines and article cited in Paragraph 283 speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 283 characterizing them. Endo lacks knowledge or information sufficient to form a belief as to

the truth of the remaining allegations in Paragraph 283 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 284:** The studies and articles cited in Paragraph 284 of the Complaint and the footnotes to Paragraph 284 speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 284 characterizing them.

**ANSWER TO PARAGRAPH 285:** Endo denies the allegations in Paragraph 285 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 285 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 286:** Endo denies the allegations in Paragraph 286 of the Complaint to the extent they refer to Endo and its purported conduct. Moreover, the letter, study and articles referenced in Paragraph 286 and cited in the footnotes to Paragraph 286 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 286 of the Complaint characterizing those materials. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 287:** Paragraph 287 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287 and denies them on that basis.

**ANSWER TO PARAGRAPH 288:** Paragraph 288 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288 and denies them on that basis.

**ANSWER TO PARAGRAPH 289:** Endo admits that it has at times provided independent educational grant funding to NIPC. The website *Painknowledge.com* and the flyer *Pain: Opioid Therapy* speak for themselves, and no further response is necessary to Plaintiffs' characterizations of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 289 characterizing them. Except as expressly admitted, Endo denies the remaining allegations in Paragraph 289.

**ANSWER TO PARAGRAPH 290:** Endo admits that it at times provided independent educational grant funding to NIPC. The CME *Persistent Pain in the Older Adult* speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 290 of the Complaint characterizing the CME. Endo denies the remaining allegations in Paragraph 290.

**ANSWER TO PARAGRAPH 291:** Endo admits that it made the article *Case Challenges in Pain Management: Opioid Therapy for Chronic Pain* available. The article speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 291 of the Complaint characterizing the document.

**ANSWER TO PARAGRAPH 292:** The article referenced in Paragraph 292 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 292 characterizing the article. Endo denies the remaining allegations in Paragraph 292.

**ANSWER TO PARAGRAPH 293:** Endo admits that it has at times provided funding for CMEs. The CME cited in Paragraph 293 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 293 characterizing the CME. Endo denies the remaining allegations in Paragraph 293 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the second sentence of Paragraph 293 and denies them on that basis.

**ANSWER TO PARAGRAPH 294:** Endo denies the allegations in the first sentence of Paragraph 294 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first sentence of Paragraph 294 to the extent they refer to other defendants and denies them on that basis. The study cited in Paragraph 294 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 294 characterizing the study.

**ANSWER TO PARAGRAPH 295:** Paragraph 295 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a

belief as to the truth of the allegations in Paragraph 295 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 296:** Paragraph 296 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 296 and denies them on that basis.

**ANSWER TO PARAGRAPH 297:** Paragraph 297 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 297 and denies them on that basis.

**ANSWER TO PARAGRAPH 298:** Paragraph 298 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 298 and denies them on that basis.

**ANSWER TO PARAGRAPH 299:** Paragraph 299 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 299 and denies them on that basis.

**ANSWER TO PARAGRAPH 300:** Paragraph 300 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 300 and denies them on that basis.

**ANSWER TO PARAGRAPH 301:** Paragraph 301 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 301 and denies them on that basis.

**ANSWER TO PARAGRAPH 302:** Paragraph 302 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 302 and denies them on that basis.

**ANSWER TO PARAGRAPH 303:** Paragraph 303 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 303 and denies them on that basis.

**ANSWER TO PARAGRAPH 304:** Paragraph 304 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 304 and denies them on that basis.

**ANSWER TO PARAGRAPH 305:** Endo denies the allegations in Paragraph 305 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the allegations in Paragraph 305 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 306:** Endo's statements related to Opana ER speak for themselves and no further response is necessary to Plaintiff's characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 306 of the Complaint characterizing the statements. Endo denies the remaining allegations in Paragraph 306 of the Complaint.

**ANSWER TO PARAGRAPH 307:** Paragraph 307 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 307 and denies them on that basis.

**ANSWER TO PARAGRAPH 308:** Endo admits that in 2012, Endo Pharmaceuticals Inc. introduced a version of Opana ER that was reformulated to make the pill harder to manipulate. Except as expressly admitted, Endo denies the allegations in Paragraph 308 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 308 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 309:** The CDC statements referenced in Paragraph 309 of the Complaint speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 309 of the Complaint characterizing them.

**ANSWER TO PARAGRAPH 310:** Paragraph 310 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 310 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 311:** Paragraph 311 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 311 and denies them on that basis.

**ANSWER TO PARAGRAPH 312:** Paragraph 312 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 312 and denies them on that basis.

**ANSWER TO PARAGRAPH 313:** Paragraph 313 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 313 and denies them on that basis.

**ANSWER TO PARAGRAPH 314:** Paragraph 314 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314 and denies them on that basis.

**ANSWER TO PARAGRAPH 315:** Paragraph 315 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315 and denies them on that basis.

**ANSWER TO PARAGRAPH 316:** Paragraph 316 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 316 and denies them on that basis.

**ANSWER TO PARAGRAPH 317:** Paragraph 317 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 317 and denies them on that basis.

**ANSWER TO PARAGRAPH 318:** Paragraph 318 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 318 and denies them on that basis.

**ANSWER TO PARAGRAPH 319:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 319 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 320:** Paragraph 320 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 320 and denies them on that basis.

**ANSWER TO PARAGRAPH 321:** Paragraph 321 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 321 and denies them on that basis.

**ANSWER TO PARAGRAPH 322:** Endo denies the allegations in Paragraph 322 of the Complaint and the heading preceding it.

**ANSWER TO PARAGRAPH 323:** Endo admits that oxymorphone has a lower oral bioavailability than certain other opioid molecules and that the bioavailability of oxymorphone varies based on the route of administration (like many drugs, in general). Except as expressly admitted, Endo denies the allegations in Paragraph 323 of the Complaint.

**ANSWER TO PARAGRAPH 324:** Endo's data referenced in Paragraph 324 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 324 characterizing it.

**ANSWER TO PARAGRAPH 325:** Endo admits that a reformulated version of Opana ER was approved by the FDA in December 2011. Except as expressly admitted, Endo denies the allegations in Paragraph 325 of the Complaint.

**ANSWER TO PARAGRAPH 326:** The FDA statements and Endo's correspondence with FDA quoted in Paragraph 326 of the Complaint speak for themselves and no further

response is necessary to Plaintiff's characterizations of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 326 characterizing FDA's statements and Endo's correspondence. Endo denies the remaining allegations in Paragraph 326.

**ANSWER TO PARAGRAPH 327:** The FDA letter cited in Paragraph 327 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 327 characterizing the letter. Endo denies the remaining allegations in Paragraph 327.

**ANSWER TO PARAGRAPH 328:** The FDA letter cited in Paragraph 328 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 328 characterizing the letter. Endo denies the remaining allegations in Paragraph 328.

**ANSWER TO PARAGRAPH 329:** The Endo documents cited in Paragraph 329 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 329 characterizing the documents. Endo denies the remaining allegations in Paragraph 329.

**ANSWER TO PARAGRAPH 330:** Endo admits that it submitted a citizen petition to FDA on August 10, 2012 regarding Opana ER; that it submitted a second citizen petition to FDA on August 31, 2012 regarding Opana ER; and that it submitted to FDA supplements to its August 10, 2012 citizen petition. The citizen petitions and supplement speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further

response is necessary, Endo denies the allegations in Paragraph 330 of the Complaint characterizing those submissions. Endo denies the remaining allegations in Paragraph 330.

**ANSWER TO PARAGRAPH 331:** The court filings cited in Paragraph 331 of the Complaint and the footnotes to Paragraph 331 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 331 characterizing the court filings.

**ANSWER TO PARAGRAPH 332:** The court filings and Endo News Release cited in Paragraph 332 of the Complaint and the footnote to Paragraph 332 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 332 characterizing the court filings and news release. Endo denies the remaining allegations in Paragraph 332.

**ANSWER TO PARAGRAPH 333:** The citizen petition cited in Paragraph 333 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 333 characterizing the citizen petition.

**ANSWER TO PARAGRAPH 334:** The FDA statements cited in Paragraph 334 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 334 characterizing the FDA statements.

**ANSWER TO PARAGRAPH 335:** The internal memorandum and data cited in Paragraph 335 of the Complaint speak for themselves and no further response is necessary to

Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 335 characterizing the internal memorandum and data. Endo denies the remaining allegations in Paragraph 335.

**ANSWER TO PARAGRAPH 336:** The *Pain Week* abstract cited in Paragraph 336 of the Complaint and the footnote to Paragraph 336 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 336 characterizing the abstract. Endo denies the remaining allegations in Paragraph 336 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 336 and denies them on that basis.

**ANSWER TO PARAGRAPH 337:** Endo denies the allegations in the first sentence of Paragraph 337 of the Complaint. The remaining allegations in Paragraph 337 quote from a purported document that speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 337 characterizing the document.

**ANSWER TO PARAGRAPH 338:** Endo denies the allegations in Paragraph 338 of the Complaint.

**ANSWER TO PARAGRAPH 339:** Paragraph 339 of the Complaint quotes from purported Endo documents that speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 339 characterizing the documents. Endo denies the remaining allegations in Paragraph 339 to the extent they refer to Endo and its purported conduct. Endo

lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 339 and denies them on that basis.

**ANSWER TO PARAGRAPH 340:** Endo's written materials and the Endo press release referenced in Paragraph 340 speaks for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 340 characterizing them. Endo denies the remaining allegations in Paragraph 340.

**ANSWER TO PARAGRAPH 341:** The Endo press releases speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 341 of the Complaint characterizing the press releases. Endo denies the remaining allegations in Paragraph 341.

**ANSWER TO PARAGRAPH 342:** The April 2013 journal advertisements, January 2013 article, and the *Pain Medicine News* website speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 342 of the Complaint characterizing them.

**ANSWER TO PARAGRAPH 343:** Endo denies the allegations in Paragraph 343 of the Complaint.

**ANSWER TO PARAGRAPH 344:** Endo admits that on June 8, 2017, the FDA requested that it remove Opana ER from the market and that on July 6, 2017, Endo announced that it decided to voluntarily remove Opana ER from the market. Endo denies the remaining allegations in Paragraph 344 of the Complaint.

**ANSWER TO PARAGRAPH 345:** Paragraph 345 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 345 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 346:** Paragraph 346 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 346 and denies them on that basis.

**ANSWER TO PARAGRAPH 347:** Paragraph 347 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 347 and denies them on that basis.

**ANSWER TO PARAGRAPH 348:** Endo denies the allegations in Paragraph 348 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 348 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 349:** Endo denies the allegations in Paragraph 349 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 349 and denies them on that basis.

**ANSWER TO PARAGRAPH 350:** Endo denies the allegations in Paragraph 350 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 350 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 351:** Endo denies the allegations in Paragraph 351 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 351 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 352:** The U.S. Senate Homeland Security and Governmental Affairs Committee Report referenced in Paragraph 352 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 352 characterizing the Report. Endo denies the remaining allegations in Paragraph 352 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 352 and denies them on that basis.

**ANSWER TO PARAGRAPH 353:** The U.S. Senate Homeland Security and Governmental Affairs Committee Report referenced in Paragraph 353 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 353 of the Complaint

characterizing the Report. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 352 and denies them on that basis.

**ANSWER TO PARAGRAPH 354:** The U.S. Senate Homeland Security and Governmental Affairs Committee Report referenced in Paragraph 354 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 354 characterizing the Report. Endo denies the remaining allegations in Paragraph 354 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 354 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 355:** The U.S. Senate Homeland Security and Governmental Affairs Committee Report referenced in Paragraph 355 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 355 of the Complaint characterizing the Report.

**ANSWER TO PARAGRAPH 356:** Endo denies the allegations in Paragraph 356 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 356 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 357:** Endo admits that it provided funding to APF prior to 2012. Except as expressly admitted, Endo denies the allegations in Paragraph 357 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 357 and denies them on that basis.

**ANSWER TO PARAGRAPH 358:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 358 and denies them on that basis.

**ANSWER TO PARAGRAPH 359:** Endo admits that it provided independent educational grant funding to NIPC. The website www.PainKnowledge.com and the Endo submission to FDA cited in Paragraph 359 of the Complaint speak for themselves and no further response is necessary. To the extent a further response is necessary, Endo denies the allegations in Paragraph 359 characterizing the website and submission. Except as expressly admitted, Endo denies the allegations in Paragraph 359 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 359 and denies them on that basis.

**ANSWER TO PARAGRAPH 360:** Endo denies the allegations in Paragraph 360 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 360 and denies them on that basis.

**ANSWER TO PARAGRAPH 361:** Endo denies the allegations in Paragraph 361 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 361 and denies them on that basis.

**ANSWER TO PARAGRAPH 362:** Paragraph 362 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 362 and denies them on that basis.

**ANSWER TO PARAGRAPH 363:** The APF meeting summary referenced in Paragraph 363 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 363 characterizing the meeting notes. Endo denies the allegations in Paragraph 363 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 363 and denies them on that basis.

**ANSWER TO PARAGRAPH 364:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 364 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 365:** Endo admits that it has provided independent educational grant funding to the AAPM and the APS at certain times. Except as expressly admitted, Endo denies the allegations in Paragraph 365 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 365 and denies them on that basis.

**ANSWER TO PARAGRAPH 366:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 366 and denies them on that basis.

**ANSWER TO PARAGRAPH 367:** Endo admits that it has at times provided independent educational grant funding to Scott Fishman. Except as expressly admitted, Endo denies the allegations in Paragraph 367 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 367 and denies them on that basis.

**ANSWER TO PARAGRAPH 368:** Endo admits that it has provided independent educational grant funding to the AAPM at certain times and that it was a corporate member of AAPM. Except as expressly admitted, Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 368 and denies them on that basis.

**ANSWER TO PARAGRAPH 369:** Endo admits that at times it was a corporate member of AAPM. Except as expressly admitted, Endo denies the allegations in Paragraph 369 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 369 and denies them on that basis.

**ANSWER TO PARAGRAPH 370:** Endo denies the allegations in Paragraph 370 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 370 and denies them on that basis.

**ANSWER TO PARAGRAPH 371:** Endo admits that it has at times provided funding to Perry Fine. Except as expressly admitted, Endo denies the allegations in Paragraph 371 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 371 and denies them on that basis.

**ANSWER TO PARAGRAPH 372:** Endo denies the allegations in Paragraph 372 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 372 and denies them on that basis.

**ANSWER TO PARAGRAPH 373:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 373 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 374:** The 2009 guidelines and CDC guidelines speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 374 characterizing the 2009 and CDC guidelines. Endo denies the allegations in Paragraph 374 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 374 and denies them on that basis.

**ANSWER TO PARAGRAPH 375:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 375 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 376:** Endo admits that it at times held speakers' programs relating to Opana ER. The presentation *The Role of Opana ER in the Management of*

*Moderate to Severe Chronic Pain* speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 376 of the Complaint characterizing the presentation. Except as expressly admitted, Endo denies the allegations in Paragraph 376 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 376 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 377:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 377 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 378:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 378 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 379:** The 1998 *Model Guidelines for the Use of Controlled Substances for the Treatment of Pain* speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 379 of the Complaint characterizing the guidelines. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 379 and denies them on that basis.

**ANSWER TO PARAGRAPH 380:** The 2004 version of the guidelines and the book, *Responsible Opioid Prescribing*, speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies

the allegations in Paragraph 380 characterizing the guidelines and book. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 380 and denies them on that basis.

**ANSWER TO PARAGRAPH 381:** The book *Responsible Opioid Prescribing* and FSMB website referenced in Paragraph 381 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 381 of the Complaint characterizing the book and the website. Endo denies the allegations in Paragraph 381 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 381 and denies them on that basis.

**ANSWER TO PARAGRAPH 382:** Endo denies the allegations in Paragraph 382 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 382 and denies them on that basis.

**ANSWER TO PARAGRAPH 383:** Endo admits that it has at times provided independent educational grant funding to the Alliance for Patient Access. Except as expressly admitted, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 383 and denies them on that basis.

**ANSWER TO PARAGRAPH 384:** Endo denies the allegations in Paragraph 384 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 384 and denies them on that basis.

**ANSWER TO PARAGRAPH 385:** The APA white paper referenced in Paragraph 385 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 385 of the Complaint characterizing the white paper.

**ANSWER TO PARAGRAPH 386:** The APA white paper referenced in Paragraph 386 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 386 of the Complaint characterizing the white paper.

**ANSWER TO PARAGRAPH 387:** The APA white paper referenced in Paragraph 387 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 387 of the Complaint characterizing the white paper. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 387 and denies them on that basis.

**ANSWER TO PARAGRAPH 388:** The APA white paper referenced in Paragraph 388 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 388 of the Complaint characterizing the white paper.

**ANSWER TO PARAGRAPH 389:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 389 and denies them on that basis.

**ANSWER TO PARAGRAPH 390:** The APA letter, DOJ memo, and article referred to in Paragraph 390 of the Complaint and the footnotes to Paragraph 390 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 390 characterizing the letter, memo, and article. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 390 and denies them on that basis.

**ANSWER TO PARAGRAPH 391:** Endo admits that it has at times provided funding to the U.S. Pain Foundation. The U.S. Pain Foundation's website referenced in Paragraph 391 of the Complaint and cited in the footnote to Paragraph 391 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 391 characterizing the website. Except as expressly admitted, Endo denies the allegations in Paragraph 391 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 391 and denies them on that basis.

**ANSWER TO PARAGRAPH 392:** Endo admits that it has at times provided independent educational grant funding to AGS in connection with a CME relating to AGS's 2009 Guidelines. Except as expressly admitted, Endo denies the allegations in Paragraph 392 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 392 and denies them on that basis.

**ANSWER TO PARAGRAPH 393:** The 2009 AGS Guidelines referenced in Paragraph 393 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of the guidelines. To the extent a further response is necessary, Endo denies the allegations in Paragraph 393 characterizing the guidelines. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 393 and denies them on that basis.

**ANSWER TO PARAGRAPH 394:** Endo denies the allegations in Paragraph 394 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 394 and denies them on that basis.

**ANSWER TO PARAGRAPH 395:** Endo denies the allegations in Paragraph 395 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 395 and denies them on that basis.

**ANSWER TO PARAGRAPH 396:** Endo admits that doctors sometimes served as consultants or on its advisory board. Except as expressly admitted, Endo denies the allegations in Paragraph 396 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 396 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 397:** Endo denies the allegations in Paragraph 397 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the allegations in Paragraph 397 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 398:** Endo denies the allegations in Paragraph 398 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 398 and denies them on that basis.

**ANSWER TO PARAGRAPH 399:** Endo denies the allegations in Paragraph 399 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 399 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 400:** Endo admits that it has at times provided funding to Perry Fine. Except as expressly admitted, Endo denies the allegations in Paragraph 400 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 400 and denies them on that basis.

**ANSWER TO PARAGRAPH 401:** Endo denies the allegations in Paragraph 401 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 401 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 402:** Endo denies the allegations in Paragraph 402 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the allegations in Paragraph 402 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 403:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 403 and denies them on that basis. Endo further denies any insinuation that it promoted any false and misleading statements or that it encouraged others to make false and misleading statements.

**ANSWER TO PARAGRAPH 404:** The article referred to in Paragraph 404 of the Complaint and the footnote to Paragraph 404 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 404 characterizing the article. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 404 and denies them on that basis.

**ANSWER TO PARAGRAPH 405:** The article referred to in Paragraph 405 of the Complaint and the footnote to Paragraph 405 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 405 characterizing the article.

**ANSWER TO PARAGRAPH 406:** Endo denies the allegations in Paragraph 406 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 406 and denies them on that basis.

**ANSWER TO PARAGRAPH 407:** Paragraph 407 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 407 and denies them on that basis.

**ANSWER TO PARAGRAPH 408:** Endo denies the allegations in Paragraph 408 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 408 and denies them on that basis.

**ANSWER TO PARAGRAPH 409:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 409 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 410:** The 2011 interview referred to in Paragraph 410 of the Complaint and the footnote to Paragraph 410 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 405 characterizing the interview.

**ANSWER TO PARAGRAPH 411:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 411 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 412:** Endo admits that articles discussing oxymorphone and oxymorphone ER were published in a supplemental issue of *Pain Medicine* but denies that those articles improperly touted Opana ER. Except as expressly admitted, Endo denies the

allegations in Paragraph 412 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 412 and denies them on that basis.

**ANSWER TO PARAGRAPH 413:** The Opioid Risk Tool referenced in Paragraph 413 of the Complaint and Endo's website speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 413 characterizing the Opioid Risk Tool and Endo's website. Endo denies the remaining allegations in Paragraph 413 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 413 and denies them on that basis.

**ANSWER TO PARAGRAPH 414:** Endo denies the allegations in Paragraph 414 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 414 and denies them on that basis.

**ANSWER TO PARAGRAPH 415:** Paragraph 415 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 415 and denies them on that basis.

**ANSWER TO PARAGRAPH 416:** Paragraph 416 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 416 and denies them on that basis.

**ANSWER TO PARAGRAPH 417:** Endo admits that it has at times provided funding to Perry Fine. Except as expressly admitted, Endo denies the allegations in Paragraph 417 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 417 and denies them on that basis.

**ANSWER TO PARAGRAPH 418:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 418 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 419:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 419 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 420:** The publication *A Clinical Guide to Opioid Analgesia* referenced in Paragraph 420 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 420 characterizing the guide.

**ANSWER TO PARAGRAPH 421:** The November 2010 article by Dr. Fine referenced in Paragraph 421 of the Complaint and cited in the footnote to Paragraph 421 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 421 characterizing the article.

**ANSWER TO PARAGRAPH 422:** The November 2010 article by Dr. Fine referenced in Paragraph 422 of the Complaint and cited in the footnote to Paragraph 422 speaks for itself

and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 422 characterizing the article.

**ANSWER TO PARAGRAPH 423:** The video referenced in Paragraph 423 of the Complaint and the footnotes to Paragraph 423 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 423 characterizing the video.

**ANSWER TO PARAGRAPH 424:** The JAMA article referenced in Paragraph 424 of the Complaint and the footnote to Paragraph 424 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 424 characterizing the article. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 424 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 425:** The publication *Responsible Opioid Prescribing* referenced in Paragraph 425 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 425 of the Complaint characterizing the guide.

**ANSWER TO PARAGRAPH 426:** The publication *Responsible Opioid Prescribing* referenced in Paragraph 426 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 426 of the Complaint characterizing the updated guide.

**ANSWER TO PARAGRAPH 427:** The publication *Responsible Opioid Prescribing* referenced in Paragraph 427 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 427 of the Complaint characterizing the updated guide.

**ANSWER TO PARAGRAPH 428:** The publication *Listening to Pain: A Physician's Guide to Improving Pain Management Through Better Communication* referenced in Paragraph 428 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 428 of the Complaint characterizing the guide.

**ANSWER TO PARAGRAPH 429:** Endo denies the allegations in Paragraph 429 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 429 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 430:** Endo denies the allegations in Paragraph 430 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 430 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 431:** Endo admits that continuing medical education programs, also referred to as CMEs, may provide ongoing education to doctors, and further admits that CME content is sometimes delivered through in-person settings, via online programming, or through other written publications. Endo lacks knowledge or information

sufficient to form a belief as to the truth of the remaining allegations in Paragraph 431 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 432:** Endo denies the allegations in Paragraph 432 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 432 and denies them on that basis.

**ANSWER TO PARAGRAPH 433:** Endo denies the allegations in Paragraph 433 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 433 and denies them on that basis.

**ANSWER TO PARAGRAPH 434:** Paragraph 434 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 434 and denies them on that basis.

**ANSWER TO PARAGRAPH 435:** Paragraph 435 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 435 and denies them on that basis.

**ANSWER TO PARAGRAPH 436:** Paragraph 436 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 436 and denies them on that basis.

**ANSWER TO PARAGRAPH 437:** Endo admits that it purchased copies of the book *Responsible Opioid Prescribing* and that it made copies of the book available to appropriate physicians. The FSMB website referenced in Paragraph 437 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 437 characterizing the website. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 437 and denies them on that basis.

**ANSWER TO PARAGRAPH 438:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 438 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 439:** The article referenced in Paragraph 439 of the Complaint and the footnote to Paragraph 439 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 439 characterizing the article.

**ANSWER TO PARAGRAPH 440:** Endo denies the allegations in Paragraph 440 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 440 and denies them on that basis.

**ANSWER TO PARAGRAPH 441:** Endo denies the allegations in Paragraph 441 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 441 and denies them on that basis.

**ANSWER TO PARAGRAPH 442:** Endo admits that it has at times advertised in medical publications. Except as expressly admitted, Endo denies the allegations in Paragraph 442 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 442 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 443:** Endo admits that it has at times made available to prescribers pamphlets or other materials that prescribers could make available to appropriate patients at their discretion. The research study cited in the footnotes to Paragraph 443 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 443 characterizing the research. Except as expressly admitted, Endo denies the allegations in Paragraph 443 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 443 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 444:** Endo admits that advertisements for a specific medication and its indication should include possible side effects and contraindications and is subject to FDA review. Endo denies the allegations in Paragraph 444 of the Complaint and the

heading preceding it to the extent they refer to Endo and its purported conduct and in particular denies the characterizations of unbranded advertising and Plaintiffs' insinuation that Endo inappropriately promoted opioids through unbranded advertising. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 444 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 445:** Endo denies the allegations in Paragraph 445 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 445 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 446:** Endo denies the allegations in Paragraph 446 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 446 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 447:** Endo denies the allegations in Paragraph 447 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 447 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 448:** Endo denies the allegations in Paragraph 448 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the allegations in Paragraph 448 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 449:** The Porter & Jick letter referred to in Paragraph 449 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 449 characterizing the letter. Endo denies the remaining allegations in Paragraph 449 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 449 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 450:** Endo denies the allegations in Paragraph 450 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 450 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 451:** Paragraph 451 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 451 and denies them on that basis.

**ANSWER TO PARAGRAPH 452:** Endo denies the allegations in Paragraph 452 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 452 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 453:** Endo admits that at times it promoted certain opioid medications through its sales representatives and that at times it had promotional speakers programs for certain opioid medications. Except as expressly admitted, Endo denies the allegations in Paragraph 453 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 453 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 454:** Endo admits that it has at times taken into account prescribers' specialties and prescription data to inform its detailing decisions. Except as expressly admitted, Endo denies the allegations in Paragraph 454 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 454 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 455:** Endo denies the allegations in Paragraph 455 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 455 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 456:** Paragraph 456 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 456 and denies them on that basis.

**ANSWER TO PARAGRAPH 457:** Endo denies the allegations in Paragraph 450 of the Complaint.

**ANSWER TO PARAGRAPH 458:** Paragraph 458 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458 and denies them on that basis.

**ANSWER TO PARAGRAPH 459:** Paragraph 459 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 459 and denies them on that basis.

**ANSWER TO PARAGRAPH 460:** Paragraph 460 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 460 and denies them on that basis.

**ANSWER TO PARAGRAPH 461:** Paragraph 461 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 461 and denies them on that basis.

**ANSWER TO PARAGRAPH 462:** Endo admits that it held speakers' programs relating to Opana ER and provided honoraria to those speakers. Except as expressly admitted, Endo denies the allegations in Paragraph 462 of the Complaint and the heading preceding it to

the extent they refer to Endo and its purported conduct and denies Plaintiffs' characterization of the speaker programs. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 462 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 463:** Paragraph 463 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 463 and denies them on that basis.

**ANSWER TO PARAGRAPH 464:** Paragraph 464 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464 and denies them on that basis.

**ANSWER TO PARAGRAPH 465:** Endo denies the allegations in Paragraph 465 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 465 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 466:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 466 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 467:** Endo admits that it has at times provided funding for CMEs and independent educational grant funding to NIPC. The CME, *Persistent Pain in the Older Adult*, and AGS 2009 guidelines cited in Paragraph 467 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 467 characterizing the CME and guidelines. Except as expressly admitted, Endo denies the allegations in Paragraph 467 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 467 and denies them on that basis.

**ANSWER TO PARAGRAPH 468:** Endo denies the allegations in Paragraph 468 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 468 and denies them on that basis.

**ANSWER TO PARAGRAPH 469:** The *Journal of American Medicine* study and the 2008 survey referenced in Paragraph 469 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 469 of the Complaint characterizing the study and survey.

**ANSWER TO PARAGRAPH 470:** The publication *Exit Wounds* speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 470 of the Complaint characterizing the publication. Endo denies the remaining allegations in Paragraph 470 to the

extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 470 and denies them on that basis.

**ANSWER TO PARAGRAPH 471:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 471 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 472:** Paragraph 472 of the Complaint and the heading preceding it concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 472 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 473:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 473 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 474:** Paragraph 474 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 474 and denies them on that basis.

**ANSWER TO PARAGRAPH 475:** Paragraph 475 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 475 and denies them on that basis.

**ANSWER TO PARAGRAPH 476:** Paragraph 476 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 476 and denies them on that basis.

**ANSWER TO PARAGRAPH 477:** Paragraph 477 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 477 and denies them on that basis.

**ANSWER TO PARAGRAPH 478:** Paragraph 478 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 478 and denies them on that basis.

**ANSWER TO PARAGRAPH 479:** Paragraph 479 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 479 and denies them on that basis.

**ANSWER TO PARAGRAPH 480:** Paragraph 480 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 480 and denies them on that basis.

**ANSWER TO PARAGRAPH 481:** Paragraph 481 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 481 and denies them on that basis.

**ANSWER TO PARAGRAPH 482:** Paragraph 482 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 482 and denies them on that basis.

**ANSWER TO PARAGRAPH 483:** Paragraph 483 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 483 and denies them on that basis.

**ANSWER TO PARAGRAPH 484:** Paragraph 484 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 484 and denies them on that basis.

**ANSWER TO PARAGRAPH 485:** Paragraph 485 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 485 and denies them on that basis.

**ANSWER TO PARAGRAPH 486:** Paragraph 486 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 486 and denies them on that basis.

**ANSWER TO PARAGRAPH 487:** Endo denies that it engaged in a marketing scheme and denies the remaining allegations in Paragraph 487 of the Complaint and the two headings preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 487 and the two headings preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 488:** Endo denies the allegations in Paragraph 488 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 488 and denies them on that basis

**ANSWER TO PARAGRAPH 489:** Endo admits that it has at times promoted certain opioid medications through its sales representatives. Except as expressly admitted, Endo denies the allegations in Paragraph 489 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 489 to the extent they refer to other defendants and denies them on that basis. Moreover, Endo's internal documents speak for themselves and no further

response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 489 characterizing its internal documents.

**ANSWER TO PARAGRAPH 490:** Paragraph 490 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 490 and denies them on that basis.

**ANSWER TO PARAGRAPH 491:** Endo admits that it at times monitored prescribing data and conducted market research. Except as expressly admitted, Endo denies the allegations in Paragraph 491 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 491 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 492:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 429 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 493:** Endo admits that it has marketed certain prescription opioids. Except as expressly admitted, Endo denies the allegations in Paragraph 493 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 493 and denies them on that basis.

**ANSWER TO PARAGRAPH 494:** Endo denies the allegations in Paragraph 494 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the allegations in Paragraph 494 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 495:** The study cited in Paragraph 495 of the Complaint and the footnote to Paragraph 492 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 495 characterizing the study. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 495 and the heading preceding it and denies them on that basis but denies any insinuation that the opioid abuse crisis involves solely the misuse or abuse of prescription opioid medications.

**ANSWER TO PARAGRAPH 496:** The articles cited in Paragraph 496 of the Complaint and the footnote to Paragraph 496 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 496 characterizing the articles. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 496 and denies them on that basis.

**ANSWER TO PARAGRAPH 497:** The CDC report referenced in Paragraph 497 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 497 characterizing the study.

**ANSWER TO PARAGRAPH 498:** The allegations in Paragraph 498 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 498 and the heading

preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 498 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 499:** The allegations in Paragraph 499 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that Defendants cannot engage in the unlawful sale of controlled substances and that there are laws and regulations that govern the manufacture and distribution of controlled substances. Endo denies any insinuation that its conduct did not comport with these principles and denies the remaining allegations in Paragraph 499 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 499 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 500:** The statute and regulations cited in Paragraph 500 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. The allegations in Paragraph 500 of the Complaint contain legal conclusions and arguments that require no answer. To the extent an answer is required, Endo acknowledges that federal law and regulations require certain parties to register as manufacturers or distributors of controlled substances under certain circumstances. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 500 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 501:** The allegations in Paragraph 501 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is

required, Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 501 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 502:** The allegations in Paragraph 502 of the Complaint contain legal conclusions and arguments that require no answer. Furthermore, the common law of Ohio speaks for itself and no response is necessary to Plaintiffs characterization of it. To the extent that an answer is required, Endo denies any insinuation that its conduct violated the common law of Ohio and denies the remaining allegations in Paragraph 502 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 502 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 503:** The allegations in Paragraph 503 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo acknowledges that information conveyed by pharmaceutical manufacturers should be accurate and truthful. Endo denies any insinuation that its conduct did not comport with this principle. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 503 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 504:** The statutes cited in Paragraph 504 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. Furthermore, the remaining allegations in Paragraph 504 of the Complaint contain legal

conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 504 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 504 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 505:** The allegations in Paragraph 505 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 505, which refer to unspecified state laws, and denies them on that basis.

**ANSWER TO PARAGRAPH 506:** The allegations in Paragraph 506 of the Complaint contain legal conclusions and arguments that require no answer. Furthermore, the Controlled Substances Act and regulations referenced in Paragraph 506 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 506 characterizing the Act and regulations and denies any insinuation that its conduct failed to conform to the requirements of the Controlled Substances Act and implementing regulations.

**ANSWER TO PARAGRAPH 507:** The allegations in Paragraph 507 of the Complaint contain legal conclusions and arguments that require no answer. Furthermore, the Controlled Substances Act referenced in Paragraph 507 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo acknowledges that the Controlled Substances Act imposes certain obligations

with respect to the manufacture and distribution of controlled substances. Endo denies the remaining allegations in Paragraph 507 characterizing the Act.

**ANSWER TO PARAGRAPH 508:** The allegations in Paragraph 508 of the Complaint contain legal conclusions and arguments that require no answer. Furthermore, the CSA language referenced in Paragraph 508 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo acknowledges that the DEA establishes annual quotas with respect to certain controlled substances. Endo denies the remaining allegations in Paragraph 508 characterizing the language.

**ANSWER TO PARAGRAPH 509:** The allegations in Paragraph 509 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo acknowledges that the DEA establishes quotas with respect to certain controlled substances. Endo denies the remaining allegations in Paragraph 509 characterizing the law.

**ANSWER TO PARAGRAPH 510:** The allegations in Paragraph 510 of the Complaint contain legal conclusions and arguments that require no answer. Furthermore, the regulations referenced in Paragraph 510 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo acknowledges that the CSA and corresponding regulations impose certain obligations with respect to the manufacture and distribution of controlled substances. Endo denies the remaining allegations in Paragraph 510 characterizing the CSA and corresponding regulations.

**ANSWER TO PARAGRAPH 511:** The allegations in Paragraph 511 of the Complaint contain legal conclusions and arguments characterizing the requirements of the CSA and corresponding regulations that require no answer. To the extent that an answer is required, Endo

acknowledges that the CSA and corresponding regulations impose certain obligations with respect to the manufacture and distribution of controlled substances but denies the allegations in Paragraph 511 characterizing those requirements.

**ANSWER TO PARAGRAPH 512:** The allegations in Paragraph 512 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies the remaining allegations in Paragraph 512 to the extent they purport to characterize those laws and regulations.

**ANSWER TO PARAGRAPH 513:** The allegations in Paragraph 513 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies the remaining allegations in Paragraph 513 to the extent they purport to characterize those laws and regulations.

**ANSWER TO PARAGRAPH 514:** The allegations in Paragraph 514 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies the remaining allegations in Paragraph 514 to the extent they purport to characterize those laws and regulations.

**ANSWER TO PARAGRAPH 515:** The court ruling referenced in Paragraph 515 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 515

characterizing the ruling. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 515 and denies them on that basis.

**ANSWER TO PARAGRAPH 516:** Endo admits that it has at times purchased prescription data from IMS and other sources and that it at times had sales representatives who conducted detailing visits to prescribers and pharmacies to provide information about Endo's medications. Endo denies the remaining allegations in Paragraph 516 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 516 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 517:** The allegations in Paragraph 517 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies the allegations in Paragraph 517 to the extent they purport to characterize those laws and regulations.

**ANSWER TO PARAGRAPH 518:** The allegations in Paragraph 518 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 518 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 518 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 519:** The allegations in Paragraph 519 of the Complaint and the heading preceding it contain legal conclusions and arguments that require no answer. To

the extent that an answer is required, Endo acknowledges that there are laws and regulations that govern the distribution of controlled substances, but denies the allegations in Paragraph 519 and the heading preceding it characterizing those laws and regulations. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 519 and denies them on that basis.

**ANSWER TO PARAGRAPH 520:** The allegations in Paragraph 520 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies any insinuation that Endo failed to comply with its obligations. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 520 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 521:** Paragraph 521 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 521 and denies them on that basis.

**ANSWER TO PARAGRAPH 522:** The Healthcare Distribution Alliance (“HDA”) guidelines referenced in Paragraph 522 of the Complaint speak for themselves and no further response is necessary to Plaintiffs’ characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 522 characterizing the guidelines. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 522 and denies them on that basis.

**ANSWER TO PARAGRAPH 523:** Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances that are administered by the DEA. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 523 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 524:** The September 2006 DEA letter referenced in Paragraph 524 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 524 characterizing the letter.

**ANSWER TO PARAGRAPH 525:** The December 2007 DEA letter referenced in Paragraph 525 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 525 characterizing the letter.

**ANSWER TO PARAGRAPH 526:** Endo denies the allegations in Paragraph 526 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct and denies that Endo acted together with any other defendant in an unlawful manner. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 526 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 527:** The court ruling referenced in Paragraph 527 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 527

characterizing the ruling. Endo admits that wholesale distributors have purchased its prescription medications. Except as expressly admitted, Endo denies the remaining allegations in Paragraph 527 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 527 and denies them on that basis.

**ANSWER TO PARAGRAPH 528:** Endo admits that wholesale drug distributors may purchase pharmaceutical medications from pharmaceutical companies and that pharmaceutical companies may offer discounts or rebates to wholesale drug distributors. Except as expressly admitted, Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 528 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 529:** Endo admits that it has at times paid rebates or chargebacks to wholesale distributors with respect to certain opioid medications. Endo denies the remaining allegations in Paragraph 529 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 529 and denies them on that basis.

**ANSWER TO PARAGRAPH 530:** Endo's contracts with other defendants referenced in Paragraph 530 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of those contracts. To the extent a further response is necessary, Endo denies the allegations in Paragraph 530 characterizing the contracts. The remaining allegations in Paragraph 530 contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies the remaining allegations in Paragraph 530 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information

sufficient to form a belief as to the truth of the remaining allegations in Paragraph 530 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 531:** Endo admits that it has at times participated in the PCF and the HDA and that these organizations have included a variety of stakeholders. Except as expressly admitted, Endo denies the allegations in Paragraph 531 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 531 to the extent they refer to other Defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 532:** Endo denies Plaintiffs' characterization of the PCF in the first sentence of Paragraph 532. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 532 and denies them on that basis.

**ANSWER TO PARAGRAPH 533:** The Center for Public Integrity article referenced in Paragraph 533 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 533 characterizing the article.

**ANSWER TO PARAGRAPH 534:** Endo admits that it has at times participated in the PCF and that the PCF has included a variety of stakeholders. Except as expressly admitted, Endo denies the allegations in Paragraph 534 of the Complaint to the extent they refer to Endo and its purported conduct and denies that it "worked together through the PCF" with other Marketing Defendants to engage in unlawful conduct. Endo lacks knowledge and information

sufficient to form a belief as to the truth of the allegations in Paragraph 534 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 535:** Endo admits that it has at times been a member of HDA. The HDA website pages referenced in Paragraph 535 of the Complaint and footnotes to Paragraph 535 speak for themselves and no further response is necessary to Plaintiff's characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 535 characterizing the website pages. Endo denies the remaining allegations in Paragraph 535 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 535 and denies them on that basis.

**ANSWER TO PARAGRAPH 536:** The HDA website page referenced in Paragraph 536 of the Complaint and the footnote to Paragraph 536 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 536 characterizing the website. Endo denies the remaining allegations in Paragraph 536 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 536 and denies them on that basis.

**ANSWER TO PARAGRAPH 537:** The HDA application referenced in Paragraph 537 of the Complaint and the footnote to Paragraph 537 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 537 characterizing the application.

**ANSWER TO PARAGRAPH 538:** The HDA application referenced in Paragraph 538 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 538 characterizing the application.

**ANSWER TO PARAGRAPH 539:** Endo denies the allegations in Paragraph 539 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 539 and denies them on that basis.

**ANSWER TO PARAGRAPH 540:** The HDA website pages referenced in Paragraph 540 of the Complaint and the footnotes to Paragraph 540 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 540 characterizing the HDA website pages. Endo denies the allegations in Paragraph 540 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 540 and denies them on that basis.

**ANSWER TO PARAGRAPH 541:** The descriptions of HDA working groups and committees referenced in Paragraph 541 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 541 characterizing the descriptions. Endo lacks knowledge and information sufficient to form a belief as to the truth of remaining allegations in Paragraph 541 and denies them on that basis.

**ANSWER TO PARAGRAPH 542:** Endo denies the allegations in Paragraph 542 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 542 and denies them on that basis.

**ANSWER TO PARAGRAPH 543:** Endo denies the allegations in Paragraph 543 to the extent they refer to Endo and its purported conduct and denies that it operated as a “united entity” with other defendants to “engage in the unlawful sale of prescription opioids.” Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 543 and denies them on that basis.

**ANSWER TO PARAGRAPH 544:** Endo denies the allegations in Paragraph 544 of the Complaint to the extent they refer to Endo and its purported conduct and denies that it engaged in “concerted joint efforts to accomplish common goals” with other defendants. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 544 and denies them on that basis.

**ANSWER TO PARAGRAPH 545:** The HDA publications and guidelines referenced in Paragraph 545 of the Complaint speak for themselves and no further response is necessary to Plaintiffs’ characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 545 characterizing the publications and guidelines. Endo denies the allegations in Paragraph 545 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 545 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 546:** The HDA statement, Industry Compliance Guidelines and testimony of John M. Gray referenced in Paragraph 546 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 546 characterizing the statement, Guidelines and testimony. Endo denies the remaining allegations in Paragraph 546.

**ANSWER TO PARAGRAPH 547:** Plaintiffs have agreed to delete the entirety of Paragraph 547 from the Complaint. Accordingly, Endo does not provide any response to this paragraph.

**ANSWER TO PARAGRAPH 548:** Endo denies the allegations in Paragraph 548 of the Complaint to the extent they refer to Endo and its purported conduct and denies that it worked with other defendants on a common "scheme" to increase production quotas. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 548 and denies them on that basis.

**ANSWER TO PARAGRAPH 549:** Endo denies the allegations in Paragraph 549 of the Complaint to the extent they refer to Endo and its purported conduct and denies that it worked with other defendants through the PCF and HDA to engage in unlawful conduct as alleged in Paragraph 549. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 549 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 550:** Endo denies the allegations in Paragraph 550 of the Complaint to the extent they refer to Endo and its purported conduct and denies that it worked

with other defendants to engage in unlawful conduct as alleged in Paragraph 550. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 550 and denies them on that basis.

**ANSWER TO PARAGRAPH 551:** The CSA referenced in Paragraph 551 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 551 characterizing the CSA. The remaining allegations in Paragraph 551 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 551.

**ANSWER TO PARAGRAPH 552:** Endo denies the allegations in Paragraph 552 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 552 and denies them on that basis.

**ANSWER TO PARAGRAPH 553:** Endo denies the allegations in Paragraph 553 of the Complaint.

**ANSWER TO PARAGRAPH 554:** The ARCOS data speaks for itself and no further response is necessary to Plaintiff's characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 554 characterizing the data. Endo denies the allegations in Paragraph 554 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct, including any insinuation that Endo has been "hiding" data. Endo lacks knowledge and information sufficient to form a belief as to the truth of the

remaining allegations in Paragraph 554 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 555:** Endo denies the allegations in Paragraph 555 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 555 and denies them on that basis.

**ANSWER TO PARAGRAPH 556:** The allegations in Subpart (d) of Paragraph 556 of the Complaint concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Subpart (d) and denies them on that basis.

With respect to Subparts (a) - (c) and (e) of Paragraph 556, Endo responds as follows:

- (a) and (b) Endo admits that it has at times purchased and used prescriber-level data for certain opioid medications. Except as expressly admitted, Endo denies the allegations in Subparts (a) and (b) to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Subparts (a) and (b) to the extent they refer to other defendants and denies them on that basis.
- (c) Endo admits that its sales representatives have at times conducted in-person visits and communicated in-person with doctors. Endo further admits that its sales representatives are required to report suspected diversion to the company in accordance with company policy. Except as expressly admitted, Endo denies the allegations in Subpart (c) to the extent

they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Subpart (c) to the extent they refer to other defendants and denies them on that basis.

- (e) Endo denies the allegations in Subpart (e) to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Subpart (e) to the extent they refer to the other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 557:** Endo denies the allegations in Paragraph 557 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 557 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 558:** Endo admits that it has at times obtained data relating to the prescribing of opioid medications from various third party vendors. Endo denies the remaining allegations in Paragraph 558 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 558 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 559:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 559 and denies them on that basis.

**ANSWER TO PARAGRAPH 560:** Endo admits that it at times purchased prescriber-level data for certain medications. Endo denies the remaining allegations in Paragraph 560 of the

Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 560 and denies them on that basis.

**ANSWER TO PARAGRAPH 561:** Endo admits that it at times purchased prescriber-level data for certain medications from IMS Health. Endo denies the remaining allegations in Paragraph 561 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 561 and denies them on that basis.

**ANSWER TO PARAGRAPH 562:** Endo admits that it at times purchased prescription data from various third-party vendors. Endo denies the remaining allegations in Paragraph 562 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 562 and denies them on that basis.

**ANSWER TO PARAGRAPH 563:** The testimony referenced in Paragraph 563 of the Complaint and the footnote to Paragraph 563 speaks for itself and no further response is necessary to Plaintiff's characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 563 characterizing the testimony. Endo denies the remaining allegations in Paragraph 563 of the Complaint.

**ANSWER TO PARAGRAPH 564:** Plaintiffs have agreed to delete the entirety of Paragraph 564 from the Complaint. Accordingly, Endo does not provide any response to this paragraph.

**ANSWER TO PARAGRAPH 565:** Endo denies the allegations in Paragraph 565 of the Complaint.

**ANSWER TO PARAGRAPH 566:** Endo denies the allegations in Paragraph 566 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 566 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 567:** Endo admits that its sales representatives are required to report suspected diversion to the company in accordance with company policy. The sales representative's statement quoted in Paragraph 567 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 567 characterizing the statement. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 567 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 568:** Endo denies the allegations in the first sentence of Paragraph 568 of the Complaint to the extent they refer to Endo and its purported conduct. The remaining allegations in Paragraph 568 concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 568 and denies them on that basis.

**ANSWER TO PARAGRAPH 569:** Paragraph 569 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required

to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 569 and denies them on that basis.

**ANSWER TO PARAGRAPH 570:** Endo denies the allegations in Paragraph 570 of the Complaint to the extent they refer to Endo and its purported conduct and further denies any insinuation that Endo subscribes to the position stated in the last sentence of Paragraph 570. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 570 and denies them on that basis.

**ANSWER TO PARAGRAPH 571:** Endo admits that it has at times considered prescription and specialty data purchased from third party vendors to inform detailing decisions. Except as expressly admitted, Endo denies the allegations in Paragraph 571 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 571 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 572:** Paragraph 572 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 572 and denies them on that basis.

**ANSWER TO PARAGRAPH 573:** Endo denies the allegations in Paragraph 573 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 573 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 574:** Endo denies the allegations in Paragraph 574 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 574 and denies them on that basis.

**ANSWER TO PARAGRAPH 575:** Endo admits that there is an illegal and illicit drug market facilitating misuse and abuse of opioids. Except as expressly admitted, Endo denies the allegations in the first sentence of Paragraph 575 of the Complaint to the extent they refer to Endo and its purported conduct. The remaining allegations in Paragraph 575 concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 575 and denies them on that basis.

**ANSWER TO PARAGRAPH 576:** Endo denies the allegations in the first sentence of Paragraph 576 of the Complaint to the extent they refer to Endo and its purported conduct. The remaining allegations in Paragraph 576 concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 576 and denies them on that basis.

**ANSWER TO PARAGRAPH 577:** Endo admits that, as disclosed in the FDA-approved label, Opana ER exposed users to the risks of addiction, abuse, and misuse. The allegations in the second sentence of Paragraph 577 of the Complaint refer to the AOD, which speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the

extent a further response is required, Endo denies the allegations in Paragraph 577 characterizing the AOD. Endo denies the remaining allegations in Paragraph 577 of the Complaint.

**ANSWER TO PARAGRAPH 578:** Endo denies the allegations in Paragraph 578 of the Complaint to the extent they refer to Endo and its purported conduct and denies that it “turned a collective blind eye” to pill mills. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 578 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 579:** The allegations in Paragraph 579 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 579 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 579 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 580:** Endo denies the allegations in Paragraph 580 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 580 and denies them on that basis.

**ANSWER TO PARAGRAPH 581:** Paragraph 581 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 581 and denies them on that basis.

**ANSWER TO PARAGRAPH 582:** Paragraph 582 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 582 and denies them on that basis.

**ANSWER TO PARAGRAPH 583:** Paragraph 583 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 583 and denies them on that basis.

**ANSWER TO PARAGRAPH 584:** Paragraph 584 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 584 and denies them on that basis.

**ANSWER TO PARAGRAPH 585:** Paragraph 585 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 585 and denies them on that basis.

**ANSWER TO PARAGRAPH 586:** Paragraph 586 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 586 and denies them on that basis.

**ANSWER TO PARAGRAPH 587:** Paragraph 587 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 587 and denies them on that basis.

**ANSWER TO PARAGRAPH 588:** Paragraph 588 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 588 and denies them on that basis.

**ANSWER TO PARAGRAPH 589:** Paragraph 589 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 589 and denies them on that basis.

**ANSWER TO PARAGRAPH 590:** Paragraph 590 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 590 and denies them on that basis.

**ANSWER TO PARAGRAPH 591:** Paragraph 591 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 591 and denies them on that basis.

**ANSWER TO PARAGRAPH 592:** Paragraph 592 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 592 and denies them on that basis.

**ANSWER TO PARAGRAPH 593:** The allegations in Paragraph 593 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 593 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 593 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 594:** Endo admits that there is an illegal drug market facilitating misuse and abuse of opioids, but denies any insinuation that its conduct was unlawful or that its conduct contributed to the illegal market. Endo further denies the allegations in the heading to Paragraph 594 of the Complaint to the extent they refer to Endo and its purported conduct and denies that it ever “pretended” to cooperate with law enforcement. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 594 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 595:** Paragraph 595 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 595 and denies them on that basis.

**ANSWER TO PARAGRAPH 596:** Paragraph 596 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 596 and denies them on that basis.

**ANSWER TO PARAGRAPH 597:** Paragraph 597 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 597 and denies them on that basis.

**ANSWER TO PARAGRAPH 598:** Paragraph 598 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 598 and denies them on that basis.

**ANSWER TO PARAGRAPH 599:** Endo denies the allegations in Paragraph 599 of the Complaint to the extent they refer to Endo and its purported conduct. Moreover, the amicus brief quoted in Paragraph 599 and cited in the footnote to Paragraph 599 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 599 characterizing the brief. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 599 and denies them on that basis.

**ANSWER TO PARAGRAPH 600:** The statements referenced in Paragraph 600 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 600

characterizing the statements. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 600 and denies them on that basis. By way of further response, Endo understands its obligations under the law and complied accordingly.

**ANSWER TO PARAGRAPH 601:** Paragraph 601 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 601 and denies them on that basis.

**ANSWER TO PARAGRAPH 602:** Endo denies the allegations in the first sentence of Paragraph 602 of the Complaint to the extent they refer to Endo and its purported conduct. The remaining allegations in Paragraph 602 concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 602 and denies them on that basis.

**ANSWER TO PARAGRAPH 603:** Paragraph 603 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603 and denies them on that basis.

**ANSWER TO PARAGRAPH 604:** Paragraph 604 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604 and denies them on that basis.

**ANSWER TO PARAGRAPH 605:** Paragraph 605 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 605 and denies them on that basis.

**ANSWER TO PARAGRAPH 606:** Endo denies the allegations in Paragraph 606 to the extent they refer to Endo and its purported conduct and denies that it violated any legal duties or did not act responsibly. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 606 and denies them on that basis.

**ANSWER TO PARAGRAPH 607:** Paragraph 607 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 607 and denies them on that basis.

**ANSWER TO PARAGRAPH 608:** Paragraph 608 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 608 and denies them on that basis.

**ANSWER TO PARAGRAPH 609:** Paragraph 609 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 609 and denies them on that basis.

**ANSWER TO PARAGRAPH 610:** Endo denies the allegations in Paragraph 610 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 610 and denies them on that basis.

**ANSWER TO PARAGRAPH 611:** The allegations in Paragraph 611 of the Complaint and the heading preceding it contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances and that those laws speak for themselves.

**ANSWER TO PARAGRAPH 612:** The allegations in Paragraph 612 of the Complaint contain legal conclusions and arguments that require no answer. The CSA sections cited in Paragraph 612 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 612 characterizing the sections. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 612 and denies them on that basis.

**ANSWER TO PARAGRAPH 613:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 613 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 614:** The allegations in Paragraph 614 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is

required, Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 614 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 615:** The allegations in Paragraph 615 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 615 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 616:** The allegations in Paragraph 616 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 616 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 617:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 617 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 618:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 618 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 619:** Paragraph 619 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619 and denies them on that basis.

**ANSWER TO PARAGRAPH 620:** Paragraph 620 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 620 and denies them on that basis.

**ANSWER TO PARAGRAPH 621:** Paragraph 621 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621 and denies them on that basis.

**ANSWER TO PARAGRAPH 622:** Paragraph 622 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622 and denies them on that basis.

**ANSWER TO PARAGRAPH 623:** Paragraph 623 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 623 and denies them on that basis.

**ANSWER TO PARAGRAPH 624:** Paragraph 624 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 624 and denies them on that basis.

**ANSWER TO PARAGRAPH 625:** Paragraph 625 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 625 and denies them on that basis.

**ANSWER TO PARAGRAPH 626:** Paragraph 626 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 626 and denies them on that basis.

**ANSWER TO PARAGRAPH 627:** Paragraph 627 of the Complaint and the heading preceding it concern defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619 and denies them on that basis.

**ANSWER TO PARAGRAPH 628:** Paragraph 628 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo denies that it “sought profits over people” and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 628 and denies them on that basis.

**ANSWER TO PARAGRAPH 629:** Paragraph 629 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 629 and denies them on that basis.

**ANSWER TO PARAGRAPH 630:** Paragraph 630 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 630 and denies them on that basis.

**ANSWER TO PARAGRAPH 631:** Paragraph 631 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 631 and denies them on that basis.

**ANSWER TO PARAGRAPH 632:** Paragraph 632 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 632 and denies them on that basis.

**ANSWER TO PARAGRAPH 633:** Paragraph 633 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 633 and denies them on that basis.

**ANSWER TO PARAGRAPH 634:** Paragraph 634 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 634 and denies them on that basis.

**ANSWER TO PARAGRAPH 635:** Paragraph 635 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 635 and denies them on that basis.

**ANSWER TO PARAGRAPH 636:** Paragraph 636 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 636 and denies them on that basis.

**ANSWER TO PARAGRAPH 637:** Paragraph 637 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 637 and denies them on that basis.

**ANSWER TO PARAGRAPH 638:** Paragraph 638 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 638 and denies them on that basis.

**ANSWER TO PARAGRAPH 639:** Paragraph 639 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 639 and denies them on that basis.

**ANSWER TO PARAGRAPH 640:** Paragraph 640 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 640 and denies them on that basis.

**ANSWER TO PARAGRAPH 641:** Paragraph 641 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 641 and denies them on that basis.

**ANSWER TO PARAGRAPH 642:** Paragraph 642 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642 and denies them on that basis.

**ANSWER TO PARAGRAPH 643:** Paragraph 643 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 643 and denies them on that basis.

**ANSWER TO PARAGRAPH 644:** Paragraph 644 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 644 and denies them on that basis.

**ANSWER TO PARAGRAPH 645:** Paragraph 645 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 645 and denies them on that basis.

**ANSWER TO PARAGRAPH 646:** Paragraph 646 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 646 and denies them on that basis.

**ANSWER TO PARAGRAPH 647:** Paragraph 647 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 647 and denies them on that basis.

**ANSWER TO PARAGRAPH 648:** Paragraph 648 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 648 and denies them on that basis.

**ANSWER TO PARAGRAPH 649:** Paragraph 649 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 649 and denies them on that basis.

**ANSWER TO PARAGRAPH 650:** Paragraph 650 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 650 and denies them on that basis.

**ANSWER TO PARAGRAPH 651:** Paragraph 651 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 651 and denies them on that basis.

**ANSWER TO PARAGRAPH 652:** Paragraph 652 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 652 and denies them on that basis.

**ANSWER TO PARAGRAPH 653:** Paragraph 653 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 653 and denies them on that basis.

**ANSWER TO PARAGRAPH 654:** Paragraph 654 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 654 and denies them on that basis.

**ANSWER TO PARAGRAPH 655:** Paragraph 655 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 655 and denies them on that basis.

**ANSWER TO PARAGRAPH 656:** Paragraph 656 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 656 and denies them on that basis.

**ANSWER TO PARAGRAPH 657:** Paragraph 657 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 657 and denies them on that basis.

**ANSWER TO PARAGRAPH 658:** Paragraph 658 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 658 and denies them on that basis.

**ANSWER TO PARAGRAPH 659:** Paragraph 659 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 659 and denies them on that basis.

**ANSWER TO PARAGRAPH 660:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 660 of the Complaint and the heading preceding it and denies them on that basis. However, Endo acknowledges that there is an illegal supply chain that fuels the illegal drug market, including illegally diverted opioids.

**ANSWER TO PARAGRAPH 661:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 661 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 662:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 662 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 663:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 663 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 664:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 664 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 665:** The Sixth Circuit decision quoted in Paragraph 665 of the Complaint and cited in the footnote to Paragraph 65 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 665 characterizing the decision. Endo lacks

knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 665 and denies them on that basis.

**ANSWER TO PARAGRAPH 666:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 666 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 667:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 667 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 668:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 668 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 669:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 669 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 670:** Endo denies the allegations in the last sentence of Paragraph 670 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 670 and denies them on that basis.

**ANSWER TO PARAGRAPH 671:** Endo admits that it has marketed its products in Ohio. Except as expressly admitted, Endo denies the allegations in Paragraph 671 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to

form a belief as to the truth of the allegations in Paragraph 671 to the extent they refer to other defendants and the two headings preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 672:** Endo admits that it has had nationwide marketing plans and promotional messages approved for use by its sales representatives on a national basis. Except as expressly admitted, Endo denies the allegations in Paragraph 672 of the Complaint and the heading immediately preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 672 and the two headings preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 673:** Endo admits that its sales representatives visited prescribers in Summit County. Except as expressly admitted, Endo denies the allegations in Paragraph 673 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 673 and denies them on that basis.

**ANSWER TO PARAGRAPH 674:** Endo admits that its products, including Opana ER, have been prescribed in Summit County. Except as expressly admitted, Endo denies the allegations in Paragraph 674 of the Complaint to the extent it refers to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 674 and denies them on that basis.

**ANSWER TO PARAGRAPH 675:** Endo denies the allegations in the first sentence of Paragraph 675 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 675 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 676:** Endo denies the allegations in Paragraph 676 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 676 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 677:** Paragraph 677 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 677 and denies them on that basis.

**ANSWER TO PARAGRAPH 678:** Endo denies the allegations in Paragraph 678 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 678 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 679:** Paragraph 679 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 679 and denies them on that basis.

**ANSWER TO PARAGRAPH 680:** Endo denies the allegations in Paragraph 680 of the Complaint.

**ANSWER TO PARAGRAPH 681:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 681 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 682:** Paragraph 682 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 682 and denies them on that basis.

**ANSWER TO PARAGRAPH 683:** Paragraph 683 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 683 and denies them on that basis.

**ANSWER TO PARAGRAPH 684:** The allegations in Paragraph 684 of the Complaint and the headings preceding it contain legal conclusions or arguments that require no answer. Further, the statutes and regulations referenced in Paragraph 684 speak for themselves and no further response is necessary to Plaintiffs' allegations characterizing those statutes. To the extent a further response is necessary, Endo denies the allegations in Paragraph 684 characterizing them and characterizing federal and Ohio law.

**ANSWER TO PARAGRAPH 685:** The regulations referenced in Paragraph 685 of the Complaint speaks for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies the remaining allegations in Paragraph 685 characterizing those laws.

**ANSWER TO PARAGRAPH 686:** The allegations in Paragraph 686 of the Complaint contain legal conclusions or arguments that require no answer. Further, the statutes and regulations referenced in Paragraph 686 speak for themselves and no further response is

necessary to Plaintiffs' allegations characterizing those statutes. To the extent a further response is necessary, Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies the remaining allegations in Paragraph 686 characterizing those laws.

**ANSWER TO PARAGRAPH 687:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 687 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 688:** Endo denies the allegations in Paragraph 688 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 688 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 689:** The OARRS data referenced in Paragraph 689 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 689 characterizing the data. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 689 and denies them on that basis.

**ANSWER TO PARAGRAPH 690:** The ARCos data referenced in Paragraph 690 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 690 characterizing the data.

**ANSWER TO PARAGRAPH 691:** The ARCOS data referenced in Paragraph 691 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 689 characterizing the data. Endo further denies the remaining allegations in Paragraph 691.

**ANSWER TO PARAGRAPH 692:** The ARCOS data referenced in Paragraph 692 of the Complaint and the footnotes to Paragraph 692 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 689 characterizing the data.

**ANSWER TO PARAGRAPH 693:** Paragraph 693 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 693 and denies them on that basis.

**ANSWER TO PARAGRAPH 694:** Paragraph 694 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 694 and denies them on that basis.

**ANSWER TO PARAGRAPH 695:** Paragraph 695 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 695 and denies them on that basis.

**ANSWER TO PARAGRAPH 696:** Paragraph 696 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 696 and denies them on that basis.

**ANSWER TO PARAGRAPH 697:** The ARCOS data and the OARRS data referenced in Paragraph 697 of the Complaint speak for themselves, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 697 characterizing the data.

**ANSWER TO PARAGRAPH 698:** The ARCOS data and OARRS data referenced in Paragraph 698 of the Complaint speak for themselves, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 698 characterizing the data.

**ANSWER TO PARAGRAPH 699:** The OARRS data referenced in Paragraph 699 of the Complaint and the footnote to paragraph 699 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 699 characterizing the data.

**ANSWER TO PARAGRAPH 700:** The ARCOS data and OARRS data referenced in Paragraph 700 of the Complaint and the footnotes to Paragraph 700 speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 700 characterizing the data.

**ANSWER TO PARAGRAPH 701:** Endo denies the allegations in Paragraph 701 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 701 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 702:** The allegations in Subparts (d), (e), and (f) of Paragraph 702 of the Complaint concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Subparts (d), (d), and (f) of Paragraph 702 and denies them on that basis.

With respect to Subparts (a), (b), (c), and (g), Endo responds as follows:

a. Endo admits that it has at times had access to prescriber-level data and other sales data for certain of its opioid medications. Except as expressly admitted, Endo denies the allegations Subpart (a) to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Subpart (a) to the extent they refer to other defendants and denies them on that basis.

b. Endo admits that it has at times used prescription data to inform its detailing decisions. Except as expressly admitted, Endo denies the allegations Subpart (b) to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Subpart (b) to the extent they refer to other defendants and denies them on that basis.

c. Endo admits that at times it promoted certain opioid medications to appropriate healthcare providers through its sales representatives. Endo denies the remaining allegations in Subpart (c) to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the allegations in Subpart (c) to the extent they refer to other defendants and denies them on that basis.

g. Endo admits that it has at times purchased prescriber-level data from IMS Health. Except as expressly admitted, Endo denies the allegations in Subpart (g) to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Subpart (g) to the extent they refer to other defendants and denies them on that basis.

**ANSWERS TO PARAGRAPHS 703 AND 704:** Plaintiffs have agreed to delete the entirety of Paragraphs 703 and 704 from the Complaint. Accordingly, Endo does not provide any response to these paragraphs.

**ANSWER TO PARAGRAPH 705:** Endo denies the allegations in Paragraph 705 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 705 and denies them on that basis.

**ANSWER TO PARAGRAPH 706:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 706 and denies them on that basis.

**ANSWER TO PARAGRAPH 707:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 707 and denies them on that basis.

**ANSWER TO PARAGRAPH 708:** Endo denies the allegations in Paragraph 708 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 708 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 709:** Endo denies the allegations in Paragraph 709 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 709 and denies them on that basis.

**ANSWER TO PARAGRAPH 710:** Endo denies the allegations in Paragraph 710 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 710 and denies them on that basis.

**ANSWER TO PARAGRAPH 711:** Plaintiffs have agreed to delete the entirety of Paragraph 711 from the Complaint. Accordingly, Endo does not provide any response to this paragraph.

**ANSWER TO PARAGRAPH 712:** Paragraph 712 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 712 and denies them on that basis.

**ANSWER TO PARAGRAPH 713:** Endo denies the allegations in Paragraph 713 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 713 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 714:** Endo denies the allegations in Paragraph 714 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported

conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 714 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 715:** The article quoted in Paragraph 715 of the Complaint and cited in the footnote to Paragraph 715 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 715 characterizing the article. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 715 and denies them on that basis.

**ANSWER TO PARAGRAPH 716:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 716 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 717:** The article quoted in Paragraph 717 of the Complaint and cited in the footnote to Paragraph 717 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 717 characterizing the article. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 717 and denies them on that basis.

**ANSWER TO PARAGRAPH 718:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 718 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 719:** The testimony referenced in Paragraph 719 of the Complaint and the footnote to Paragraph 719 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 719 characterizing the testimony. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 719 and denies them on that basis.

**ANSWER TO PARAGRAPH 720:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 720 of the Complaint and denies it on that basis.

**ANSWER TO PARAGRAPH 721:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 721 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 722:** The study referenced in Paragraph 722 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 722 of the Complaint characterizing the study. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 722 and denies them on that basis.

**ANSWER TO PARAGRAPH 723:** The Ohio Attorney General's website referenced in Paragraph 723 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 723 characterizing the website. Endo lacks knowledge or information

sufficient to form a belief as to the truth of the remaining allegations in Paragraph 723 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 724:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 724 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 725:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 725 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 726:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 726 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 727:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 727 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 728:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 728 and denies them on that basis.

**ANSWER TO PARAGRAPH 729:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 729 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 730:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 730 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 731:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 731 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 732:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 732 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 733:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 733 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 734:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 734 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 735:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 735 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 736:** The PCSAO report referenced in Paragraph 736 of the Complaint and the footnote to Paragraph 736 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo

denies the allegations in Paragraph 736 characterizing the information. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 736 and denies them on that basis.

**ANSWER TO PARAGRAPH 737:** The PCSAO report referenced in Paragraph 737 of the Complaint and the footnote to Paragraph 737 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 737 characterizing the report. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 737 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 738:** The PCSAO report referenced in Paragraph 738 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 738 characterizing the report. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 738 and denies them on that basis.

**ANSWER TO PARAGRAPH 739:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 739 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 740:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 740 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 741:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 741 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 742:** The OPQC study referenced in Paragraph 742 of the Complaint and the footnote to Paragraph 742 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 742 characterizing the study. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 742 and denies them on that basis.

**ANSWER TO PARAGRAPH 743:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 743 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 744:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 744 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 745:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 745 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 746:** Endo denies the allegations of a conspiracy and denies the remaining allegations in Paragraph 746 of the Complaint and the headings preceding it.

**ANSWER TO PARAGRAPH 747:** Endo denies the allegations in Paragraph 747 of the Complaint.

**ANSWER TO PARAGRAPH 748:** Endo denies the allegations in Paragraph 748 of the Complaint.

**ANSWER TO PARAGRAPH 749:** Endo denies the allegations in Paragraph 749 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 749 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 750:** Endo denies the allegations in Paragraph 750 of the Complaint to the extent they refer to Endo and its purported conduct and denies that it worked collectively with other defendants. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 750 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 751:** Endo denies the allegations in Paragraph 751 of the Complaint.

**ANSWER TO PARAGRAPH 752:** Endo denies the allegations in Paragraph 752 of the Complaint.

**ANSWER TO PARAGRAPH 753:** Endo denies the allegations in Paragraph 753 of the Complaint.

**ANSWER TO PARAGRAPH 754:** Endo denies the allegations in the first sentence of Paragraph 754 of the Complaint. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 754 and denies them on that basis.

**ANSWER TO PARAGRAPH 755:** Endo denies the allegations in Paragraph 755 of the Complaint.

**ANSWER TO PARAGRAPH 756:** The Porter & Jick Letter referenced in Paragraph 756 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 756 characterizing the letter. Endo denies the remaining allegations in Paragraph 756.

**ANSWER TO PARAGRAPH 757:** Endo denies the allegations in Paragraph 757 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 757 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 758:** The NEJM letter referenced in Paragraph 758 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 758 characterizing the letter. Endo denies the remaining allegations in Paragraph 758.

**ANSWER TO PARAGRAPH 759:** The allegations in Paragraph 759 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 759 of the Complaint.

**ANSWER TO PARAGRAPH 760:** Endo denies the allegations in Paragraph 760 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct and further denies that there was an agreement or conspiracy among defendants. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 760 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 761:** Endo denies the allegations in Paragraph 761 of the Complaint.

**ANSWER TO PARAGRAPH 762:** Endo denies the allegations in Paragraph 762 of the Complaint.

**ANSWER TO PARAGRAPH 763:** Endo denies the allegations in Paragraph 763 of the Complaint.

**ANSWER TO PARAGRAPH 764:** Endo denies the allegations in Paragraph 764 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 764 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 765:** Endo denies the allegations in Paragraph 765 of the Complaint.

**ANSWER TO PARAGRAPH 766:** Endo denies the allegations in Paragraph 766 of the Complaint.

**ANSWER TO PARAGRAPH 767:** The allegations in Paragraph 767 of the Complaint and the two headings preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it has engaged in unlawful conduct and denies that Plaintiffs are entitled to any relief from Endo.

**ANSWER TO PARAGRAPH 768:** The allegations in Paragraph 768 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 768 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 768 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 769:** The allegations in Paragraph 769 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 769 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 769 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 770:** The allegations in Paragraph 770 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 770 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 770 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 771:** Endo denies the allegations of Paragraph 771 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 771 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 772:** Endo denies the allegations of Paragraph 772 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 772 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 773:** The allegations in Paragraph 773 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 773 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 773 and denies them on that basis.

**ANSWER TO PARAGRAPH 774:** Endo denies the allegations of Paragraph 774 to the extent they refer to Endo and its purported conduct and denies that Endo engaged in a campaign with other defendants to deceive the public. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 774 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 775:** The proceedings in this case and the April 11, 2018 Northern District of Ohio Order speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 775 of the Complaint characterizing the proceedings and Order. Further, the allegations in Paragraph 775 contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 775 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 775 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 776:** Endo denies the allegations of Paragraph 776 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 776 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 777:** The allegations in Paragraph 777 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 777 and denies them on that basis. Further, Endo denies any insinuation that it did not comply with its legal obligations.

**ANSWER TO PARAGRAPH 778:** Endo denies the allegations of Paragraph 778 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 778 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 779:** Endo denies the allegations of Paragraph 779 to the extent they refer to Endo and its purported conduct and denies that Endo acted in concert with any other defendant. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 779 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 780:** The allegations in Paragraph 780 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 780 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 780 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 781:** The allegations in Paragraph 781 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 781 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 781 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 782:** Endo denies the allegations of Paragraph 782 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 782 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 783:** Paragraph 783 of the Complaint and the heading preceding it concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 783 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 784:** Paragraph 784 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 784 and denies them on that basis.

**ANSWER TO PARAGRAPH 785:** Paragraph 785 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 785 and denies them on that basis.

**ANSWER TO PARAGRAPH 786:** Paragraph 786 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 786 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 787:** Paragraph 787 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 787 and denies them on that basis.

**ANSWER TO PARAGRAPH 788:** Paragraph 788 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 788 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 789:** Paragraph 789 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 789 and denies them on that basis.

**ANSWER TO PARAGRAPH 790:** Paragraph 790 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 790 and denies them on that basis.

**ANSWER TO PARAGRAPH 791:** Paragraph 791 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 791 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 792:** Paragraph 792 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 792 and denies them on that basis.

**ANSWER TO PARAGRAPH 793:** The allegations in Paragraph 793 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 793 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 793 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 794:** The 60 Minutes interview referenced in Paragraph 794 of the Complaint speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 794 characterizing the interview.

**ANSWER TO PARAGRAPH 795:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 795 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 796:** Paragraph 796 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 796 and denies them on that basis.

**ANSWER TO PARAGRAPH 797:** Paragraph 797 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 797 and denies them on that basis.

**ANSWER TO PARAGRAPH 798:** Paragraph 798 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 798 and denies them on that basis.

**ANSWER TO PARAGRAPH 799:** Paragraph 799 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 799 and denies them on that basis.

**ANSWER TO PARAGRAPH 800:** Paragraph 800 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 800 and denies them on that basis.

**ANSWER TO PARAGRAPH 801:** Paragraph 801 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 801 and denies them on that basis.

**ANSWER TO PARAGRAPH 802:** Paragraph 802 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 802 and denies them on that basis.

**ANSWER TO PARAGRAPH 803:** Paragraph 803 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 803 and denies them on that basis.

**ANSWER TO PARAGRAPH 804:** Paragraph 804 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 804 and denies them on that basis.

**ANSWER TO PARAGRAPHS 805, 806 AND 807:** Plaintiffs have agreed to delete the entirety of Paragraphs 805, 806 and 807 from the Complaint. Accordingly, Endo does not provide any response to these paragraphs.

**ANSWER TO PARAGRAPH 808:** Paragraph 808 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 808 and denies them on that basis.

**ANSWER TO PARAGRAPH 809:** Paragraph 809 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 809 and denies them on that basis.

**ANSWER TO PARAGRAPH 810:** Paragraph 810 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 810 and denies them on that basis.

**ANSWER TO PARAGRAPH 811:** Paragraph 811 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 811 and denies them on that basis.

**ANSWER TO PARAGRAPH 812:** Endo admits that it entered into an Assurance of Discontinuance with the New York Attorney General. The AOD speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 812 of the Complaint characterizing the AOD. Endo denies the remaining allegations in Paragraph 812 to the extent they refer to Endo and its purported conduct.

**ANSWER TO PARAGRAPH 813:** Endo denies the allegations in Paragraph 813 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 813 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 814:** The allegations in Paragraph 814 of the Complaint and the three headings preceding Paragraph 814 contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in any “opioid marketing enterprise” or “scheme” and denies the remaining allegations in Paragraph 814 and the three headings preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 9 and denies them on that basis.

**ANSWER TO PARAGRAPH 815:** The allegations in Paragraph 815 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it participated in any “opioid marketing enterprise” or engaged in any action in furtherance thereof and denies the remaining allegations in Paragraph 815 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 815 and denies them on that basis.

**ANSWER TO PARAGRAPH 816:** Endo denies that it engaged in an “opioid marketing enterprise” with other defendants and denies the remaining allegations of Paragraph 816 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 816 and denies them on that basis.

**ANSWER TO PARAGRAPH 817:** The allegations in Paragraph 817 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it participated in any “scheme” or “common course of conduct” with

other defendants as alleged in Paragraph 817. Endo further denies the remaining allegations in Paragraph 817 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 817 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 818:** The allegations in Paragraph 818 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 818 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 818 and denies them on that basis.

**ANSWER TO PARAGRAPH 819:** The allegations in Paragraph 819 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 819 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 819 and denies them on that basis.

**ANSWER TO PARAGRAPH 820:** The allegations in Paragraph 820 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 820 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 820 and denies them on that basis.

**ANSWER TO PARAGRAPH 821:** Endo denies the allegations of Paragraph 821 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information

sufficient to form a belief as to the truth of the remaining allegations in Paragraph 821 and denies them on that basis.

**ANSWER TO PARAGRAPH 822:** The allegations in Paragraph 822 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in an “opioid marketing enterprise” and denies the remaining allegations of Paragraph 822 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 822 and denies them on that basis.

**ANSWER TO PARAGRAPH 823:** The allegations in Paragraph 823 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in an “opioid marketing enterprise” and denies the remaining allegations of Paragraph 823 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 823 and denies them on that basis.

**ANSWER TO PARAGRAPH 824:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 824 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 825:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 825 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 826:** The allegations in Paragraph 826 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in an “opioid marketing enterprise” or that it sought to accomplish a common purpose with other defendants. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 826 and denies them on that basis.

**ANSWER TO PARAGRAPH 827:** The allegations in Paragraph 827 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 827 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 827 and denies them on that basis.

**ANSWER TO PARAGRAPH 828:** The allegations in Paragraph 828 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 828 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 828 and denies them on that basis.

**ANSWER TO PARAGRAPH 829:** The allegations in Paragraph 829 of the Complaint, the subparts thereto, and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 829, and all Subparts thereto, and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 829, and all Subparts thereto, and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 830:** The allegations in Paragraph 830 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in an “opioid marketing enterprise” and further denies the allegations of Paragraph 830 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 830 and denies them on that basis.

**ANSWER TO PARAGRAPH 831:** The allegations in Paragraph 831 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 831, and all Subparts thereto, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 831, and all Subparts thereto, and denies them on that basis.

**ANSWER TO PARAGRAPH 832:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 832 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 833:** The allegations in Paragraph 833 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 833, and all Subparts thereto, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to

form a belief as to the truth of the remaining allegations in Paragraph 833, and all Subparts thereto, and denies them on that basis.

**ANSWER TO PARAGRAPH 834:** The allegations in Paragraph 834 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in an “scheme” or “common course of action” with other defendants and further denies the allegations of Paragraph 834 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 834 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 835:** Endo denies the allegations of Paragraph 835 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 835 and the heading preceding it and denies them on that basis.

**ANSWER TO PARAGRAPH 836:** Endo denies that it worked together with other defendants as alleged in Paragraph 836 of the Complaint and denies the remaining allegations of Paragraph 836 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 836 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 837:** Endo denies the allegations of Paragraph 837 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 837 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 838:** The allegations in Paragraph 838 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 838 of the Complaint.

**ANSWER TO PARAGRAPH 839:** The allegations in Paragraph 839 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 839 of the Complaint.

**ANSWER TO PARAGRAPH 840:** The allegations in Paragraph 840 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 840 of the Complaint.

**ANSWER TO PARAGRAPH 841:** The allegations in Paragraph 841 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 841 of the Complaint.

**ANSWER TO PARAGRAPH 842:** The allegations in Paragraph 842 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 842 of the Complaint.

**ANSWER TO PARAGRAPH 843:** The allegations in Paragraph 843 of the Complaint, and all Subparts thereto, contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 843, and all Subparts thereto, of the Complaint.

**ANSWER TO PARAGRAPH 844:** The allegations in Paragraph 844 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 844 of the Complaint.

**ANSWER TO PARAGRAPH 845:** The allegations in Paragraph 845 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 845 of the Complaint.

**ANSWER TO PARAGRAPH 846:** The allegations in Paragraph 846 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 846 of the Complaint.

**ANSWER TO PARAGRAPH 847:** The allegations in Paragraph 847 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 847 of the Complaint.

**ANSWER TO PARAGRAPH 848:** The allegations in Paragraph 848 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it participated in an “opioid marketing enterprise” and denies that it participated in an “opioid marketing enterprise” and denies the remaining allegations of Paragraph 848 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 848 and denies them on that basis.

**ANSWER TO PARAGRAPH 849:** The allegations in Paragraph 849 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo denies the allegations of Paragraph 849 to the extent they refer to Endo and its purported conduct and denies that Endo worked with other defendants in an illicit enterprise. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 849 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 850:** The allegations in Paragraph 850 of the Complaint contain legal conclusions or arguments that require no answer. Further, the Controlled Substances Act referenced in Paragraph 850 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 850 characterizing the Controlled Substances Act. Endo denies the remaining allegations in Paragraph 850 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 850 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 851:** The Controlled Substances Act cited in Paragraph 851 of the Complaint speaks for itself and no further response is necessary to Plaintiffs' characterization of it. Further, the allegations in Paragraph 851 contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo acknowledges that there are laws and regulations that require reporting under certain circumstances. Endo denies the allegations of Paragraph 851 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 851 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 852:** The Controlled Substances Act and Racketeer Influenced and Corrupt Organizations Act cited in Paragraph 852 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. Further, the allegations in Paragraph 852 contain legal conclusions or arguments that require no answer. Endo denies the remaining allegations of Paragraph 852 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 852 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 853:** The allegations in Paragraph 853 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 853 to the extent they refer to Endo and its purported conduct and denies that there was any "scheme." Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 853 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 854:** The allegations in Paragraph 854 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 854 to the extent they refer to Endo and its purported conduct and denies that it acted jointly with other defendants in violation of any law. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 854 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 855:** The allegations in Paragraph 855 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo denies the allegations of Paragraph 855 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 855 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 856:** Endo denies the allegations of Paragraph 856 of the Complaint, and all Subparts thereto, to the extent they allege that End disseminated “false and misleading statements.” Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 856, and all Subparts thereto, to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 857:** Endo denies the allegations of Paragraph 857 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 857 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 858:** The Controlled Substances Act and the Code of Federal Regulations cited in Paragraph 858 of the Complaint speak for themselves and no further response is necessary to Plaintiffs’ characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 858 of the Complaint characterizing the Controlled Substances Act and Code of Federal Regulations.

**ANSWER TO PARAGRAPH 859:** The allegations in Paragraph 859 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 859 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 859 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 860:** The allegations in Paragraph 860 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 860 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 860 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 861:** The allegations in Paragraph 861 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 861 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 861 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 862:** The allegations in Paragraph 862 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 862 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 862 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 863:** The allegations in Paragraph 863 of the Complaint, and all Subparts thereto, contain legal conclusions or arguments that require no answer. To the

extent an answer is required, Endo denies the allegations of Paragraph 863, and all Subparts thereto, to the extent they characterize as illegal any purported conduct by Endo. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 863, and all Subparts thereto, to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 864:** The allegations in Paragraph 864 of the Complaint and the accompanying table contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 864 and the accompanying table to the extent they characterize as illegal any purported conduct by Endo. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 864 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 865:** Endo denies the allegations of Paragraph 865 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 865 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 866:** The allegations in Paragraph 866 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 866 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 866 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 867:** Endo denies the allegations of Paragraph 867 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 867 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 868:** Endo's communications referenced in Paragraph 868 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations of Paragraph 868 of the Complaint to the extent they characterize the communications. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 868 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 869:** The allegations in Paragraph 869 of the Complaint contain legal conclusions or arguments that require no answer. Further, Endo's communications referenced in Paragraph 869 of the Complaint speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations of Paragraph 869 of the Complaint to the extent they characterize the communications. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 869 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 870:** The allegations in Paragraph 870 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 870 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 870 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 871:** The allegations in Paragraph 871 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 871 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 871 and denies them on that basis.

**ANSWER TO PARAGRAPH 872:** The allegations in Paragraph 872 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 872 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 872 and denies them on that basis.

**ANSWER TO PARAGRAPH 873:** The allegations in Paragraph 873 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 873 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 873 and denies them on that basis.

**ANSWER TO PARAGRAPH 874:** The allegations in Paragraph 874 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 874 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 874 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 875:** 21 C.F.R. § 1301.74 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. Further, the allegations in Paragraph 875 contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 875 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 875 and denies them on that basis.

**ANSWER TO PARAGRAPH 876:** The allegations in Paragraph 876 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in any "racketeering activity" and denies the remaining allegations of Paragraph 876 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 876 and denies them on that basis.

**ANSWER TO PARAGRAPH 876:** The allegations in Paragraph 877 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 877 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 877 to the extent they refer to other defendants and denies them on that basis.

**CLAIMS FOR RELIEF**

**ANSWER TO PARAGRAPH 878:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 879:** The allegations in Paragraph 879 of the Complaint contain legal conclusions or arguments that require no answer. Further, 18 U.S.C. §§ 1962(c) and (d) speak for themselves and no response is required to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 879 characterizing the cited statute and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 879 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 880:** The allegations in Paragraph 880 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 880 of the Complaint.

**ANSWER TO PARAGRAPH 881:** The allegations in Paragraph 881 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 881 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 881 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 882:** The allegations in Paragraph 882 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is

required, Endo denies the allegations in Paragraph 882 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 882 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 883:** The allegations in Paragraph 883 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 883 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 883 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 884:** The allegations in Paragraph 884 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 884 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 884 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 885:** The allegations in Paragraph 885 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 885 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 885 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 886:** The allegations in Paragraph 886 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 886 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 886 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 887:** The allegations in Paragraph 887 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 887 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 887 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 888:** The allegations in Paragraph 888 of the Complaint contain legal conclusions or arguments that require no answer. Further, 18 U.S.C. § 1341 and § 1343 speak for themselves and no response is required to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 888 characterizing the cited statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 888 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 889:** The allegations in Paragraph 889 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 889 with respect to Endo and its purported

conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 889 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 890:** The allegations in Paragraph 890 of the Complaint and all Subparts thereto contain legal conclusions or arguments that require no answer. Further, the cited statutes speak for themselves and no response is required to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 890 and all Subparts thereto with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 890 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 891:** The allegations in Paragraph 891 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 891 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 891 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 892:** The allegations in Paragraph 892 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 892 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 892 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 893:** The allegations in Paragraph 893 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 893 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 893 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 894:** The allegations in Paragraph 894 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 894 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 894 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 895:** The allegations in Paragraph 895 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 895 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 895 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 896:** The allegations in Paragraph 896 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 896 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 896 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 897:** The allegations in Paragraph 897 of the Complaint contain legal conclusions or arguments that require no answer. Further, 18 U.S.C. §§ 1341 and 1343 speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 897 characterizing the cited statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 897 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 898:** The allegations in Paragraph 898 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 898 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 898 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 899:** The allegations in Paragraph 899 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 899 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 899 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 900:** The allegations in Paragraph 900 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 900 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 900 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 901:** The allegations in Paragraph 901 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 901 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 901 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 902:** The allegations in Paragraph 902 of the Complaint and all Subparts thereto contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 902 and all Subparts thereto with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 902 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 903:** The allegations in Paragraph 903 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 903 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 903 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 904:** The allegations in Paragraph 904 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies that Plaintiffs area entitled to any relief from Endo.

**ANSWER TO PARAGRAPH 905:** The allegations in Paragraph 905 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent that an answer is required, Endo denies that Plaintiffs are entitled to any damages or other relief, including the relief requested in Paragraph 905, from Endo.

**ANSWER TO PARAGRAPH 906:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 907:** The allegations in Paragraph 907 of the Complaint contain legal conclusions or arguments that require no answer. Further, 18 U.S.C. § 1961(3) speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 907 characterizing that statute.

**ANSWER TO PARAGRAPH 908:** The allegations in Paragraph 908 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 908 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 908 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 909:** The allegations in Paragraph 909 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo admits that it has, at times, been a member of the HDA. Except as expressly admitted, Endo denies the allegations in Paragraph 909 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 909 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 910:** The allegations in Paragraph 910 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 910 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 910 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 911:** The allegations in Paragraph 911 of the Complaint contain legal conclusions or arguments that require no answer. Further, the statutes cited in Paragraph 911 speak for themselves, and no further response is necessary to Plaintiffs' characterization of those statutes. To the extent that an answer is required, Endo denies the allegations in Paragraph 911 characterizing the cited statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to

form a belief as to the truth of the allegations in Paragraph 911 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 912:** The allegations in Paragraph 912 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 912 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 912 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 913:** The allegations in Paragraph 913 of the Complaint contain legal conclusions or arguments that require no answer. Further, Section 102 of the Controlled Substance Act speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 913 of the Complaint characterizing the Controlled Substance Act and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 913 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 914:** The allegations in Paragraph 914 of the Complaint contain legal conclusions or arguments that require no answer. Further, 21 U.S.C. §§ 843(a)(4) and 843(d)(1) speak for themselves, and no further response is necessary to plaintiffs characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 914 characterizing those statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 914 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 915:** The allegations in Paragraph 915 of the Complaint contain legal conclusions or arguments that require no answer. Further, 21 U.S.C. § 823 and 21 C.F.R. § 1301.74(b) speak for themselves, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo acknowledges that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies Plaintiffs' characterization of those laws and regulations. Endo denies the allegations in Paragraph 915 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 915 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 916:** The allegations in Paragraph 916 of the Complaint and all Subparts thereto contain legal conclusions or arguments that require no answer. Further, the cited statutes speak for themselves and no response is required to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 916 and all Subparts thereto with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 916 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 917:** Paragraph 917 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 917 and denies them on that basis.

**ANSWER TO PARAGRAPH 918:** The allegations in Paragraph 918 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 918 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 918 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 919:** The allegations in Paragraph 919 of the Complaint contain legal conclusions or arguments that require no answer. Further, 18 U.S.C. §§ 1341 and 1343 speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 919 characterizing those statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 919 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 920:** The allegations in Paragraph 920 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 920 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 920 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 921:** The allegations in Paragraph 921 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is

required, Endo denies the allegations in Paragraph 921 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 921 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 922:** The allegations in Paragraph 922 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 922 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 922 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 923:** The allegations in Paragraph 923 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 923 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 923 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 924:** The allegations in Paragraph 924 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 924 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 924 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 925:** The allegations in Paragraph 925 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 925 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 925 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 926:** The allegations in Paragraph 926 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 926 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 926 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 927:** The allegations in Paragraph 927 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 927 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 927 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 928:** The allegations in Paragraph 928 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 928 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 928 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 929:** The allegations in Paragraph 929 of the Complaint contain legal conclusions or arguments that require no answer. Further, the CSA and Code of Federal Regulations speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 929 characterizing the statute and regulations and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 929 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 930:** The allegations in Paragraph 930 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent that an answer is required, Endo denies the allegations in Paragraph 930 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 930 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 931:** The allegations in Paragraph 931 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 931 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 931 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 932:** The allegations in Paragraph 932 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 932 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 932 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 933:** The allegations in Paragraph 933 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 933 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 933 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 934:** The allegations in Paragraph 934 of the Complaint and all Subparts thereto contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 934 and all Subparts thereto with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 934 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 935:** The allegations in Paragraph 935 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 935 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 935 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 936:** The allegations in Paragraph 936 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 936 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 936 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 937:** The allegations in Paragraph 937 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies that Plaintiffs are entitled to any relief from Endo.

**ANSWER TO PARAGRAPH 938:** The allegations in Paragraph 938 of the Complaint and all Subparts thereto contain legal conclusions or arguments to which no answer is required. To the extent that an answer is required, Endo denies that Plaintiffs are entitled to any damages or other relief, including the relief requested in Paragraph 938 and all Subparts thereto, from Endo.

**ANSWER TO PARAGRAPH 939:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 940:** The allegations in Paragraph 940 of the Complaint contain legal conclusions or arguments that require no answer. Further, Ohio Revised Code Section 2923.31(G) speaks for itself, and no further response is necessary to Plaintiffs'

characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 940 characterizing the cited code.

**ANSWER TO PARAGRAPH 941:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 942:** The allegations in Paragraph 942 of the Complaint contain legal conclusions or arguments that require no answer. Further, Ohio Rev. Code Ann. § 2923.31(C) speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 942 characterizing that code and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 942 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 943:** The allegations in Paragraph 943 of the Complaint contain legal conclusions or arguments that require no answer. Further, Ohio Rev. Code Ann. §§ 2923.31(1) and (2) speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 943 characterizing that code and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 943 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 944:** The allegations in Paragraph 944 of the Complaint contain legal conclusions or arguments that require no answer. Further, the cited statutes speak

for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 944 characterizing the cited statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 944 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 945:** The allegations in Paragraph 945 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 945 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 945 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 946:** The allegations in Paragraph 946 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 946 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 946 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 947:** The allegations in Paragraph 947 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 947 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 947 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 948:** The allegations in Paragraph 948 of the Complaint and all Subparts thereto contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 948 and all Subparts thereto with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 948 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 949:** The allegations in Paragraph 949 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent that an answer is required, Endo denies that Plaintiffs are entitled to any damages or other relief, including the relief requested in Paragraph 949, from Endo.

**ANSWER TO PARAGRAPH 950:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 951:** The allegations in Paragraph 951 of the Complaint contain legal conclusions or arguments that require no answer. Further, Ohio Revised Code Section 2923.31(G) speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 951 characterizing the cited code.

**ANSWER TO PARAGRAPH 952:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 953:** The allegations in Paragraph 953 of the Complaint contain legal conclusions or arguments that require no answer. Further, Ohio Rev. Code Ann. § 2923.31(C) speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 953 characterizing that code and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 953 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 954:** The allegations in Paragraph 954 of the Complaint contain legal conclusions or arguments that require no answer. Further, Ohio Rev. Code Ann. §§ 2923.31(I)(1) and (2) speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 954 characterizing that code and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 954 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 955:** The allegations in Paragraph 955 of the Complaint contain legal conclusions or arguments that require no answer. Further, the cited statutes speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 955 characterizing

the cited statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 955 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 956:** The allegations in Paragraph 956 of the Complaint contain legal conclusions or arguments that require no answer. Further, the Controlled Substances Act speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 956 characterizing the CSA and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 956 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 957:** The allegations in Paragraph 957 of the Complaint contain legal conclusions or arguments that require no answer. Further, the Controlled Substances Act and cited testimony speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 957 characterizing the CSA and testimony and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 957 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 958:** Endo denies the allegations in Paragraph 958 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the allegations in Paragraph 958 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 959:** Endo denies the allegations in Paragraph 959 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 959 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 960:** The allegations in Paragraph 960 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 960 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 960 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 961:** The allegations in Paragraph 961 of the Complaint contain legal conclusions or arguments that require no answer. Further, the statutes cited in Paragraph 961 speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 961 characterizing the cited statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 961 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 961:** The allegations in Paragraph 962 of the Complaint contain legal conclusions or arguments that require no answer. Further, the statutes cited in

Paragraph 962 speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 962 characterizing the cited statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 962 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 963:** The allegations in Paragraph 963 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 963 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 963 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 964:** The allegations in Paragraph 964 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 964 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 964 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 965:** The allegations in Paragraph 965 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 965 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 965 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 966:** The allegations in Paragraph 966 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 966 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 966 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 967:** The allegations in Paragraph 967 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 967 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 967 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 968:** The allegations in Paragraph 968 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 968 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 968 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 969:** Endo restates its answer to every allegation set forth above in Section I.G as though fully set forth herein.

**ANSWER TO PARAGRAPH 970:** The allegations in Paragraph 970 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 970 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 970 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 971:** The allegations in Paragraph 971 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 971 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 971 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 972:** The allegations in Paragraph 972 of the Complaint and all Subparts thereto contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 972 and all Subparts thereto with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 972 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 973:** The allegations in Paragraph 973 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent that an answer is required, Endo denies that Plaintiffs are entitled to any damages or other relief, including the relief requested in Paragraph 973, from Endo.

**ANSWER TO PARAGRAPH 974:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 975:** Endo denies that it violated R.C. § 3767.03 and denies that Plaintiffs are entitled to any relief. R.C. § 3767.03 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 975 of the Complaint characterizing the Code.

**ANSWER TO PARAGRAPH 976:** Endo denies that it violated O.R.C. § 4729.35 and denies that Plaintiffs are entitled to any relief from Endo. O.R.C. § 4729.35 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 976 of the Complaint characterizing the Code.

**ANSWER TO PARAGRAPH 977:** Endo denies that it violated. R.C. § 715.44 and denies that Plaintiffs are entitled to any relief from Endo. R.C. § 715.44 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 977 of the Complaint characterizing the Code. Moreover, the Court dismissed for lack of standing the claim brought by the City of Akron, pursuant to its Opinion and Order in this case of December 19, 2018.

**ANSWER TO PARAGRAPH 978:** The allegations in Paragraph 978 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 3767.01 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a

further response is necessary, Endo denies the allegations in Paragraph 978 characterizing the Code.

**ANSWER TO PARAGRAPH 979:** The allegations in Paragraph 979 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 4729.35 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 979 characterizing the Code.

**ANSWER TO PARAGRAPH 980:** The allegations in Paragraph 980 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 3719.011 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 980 characterizing the Code.

**ANSWER TO PARAGRAPH 981:** The allegations in Paragraph 981 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 3767.02 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 981 characterizing the Code.

**ANSWER TO PARAGRAPH 982:** The allegations in Paragraph 982 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 3767.02 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 982 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to

form a belief as to the truth of the allegations in Paragraph 982 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 983:** The allegations in Paragraph 983 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 3719.011 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 983 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 983 to the extent they refer to other Defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 984:** The allegations in Paragraph 984 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 4729.01(F), O.A.C. §§ 4729-9-12, 4729-916, 4729-9-28, 21 U.S.C.A. § 823 and 21 CFR § 1301.74 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 984 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 984 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 985:** The allegations in Paragraph 985 of the Complaint contain legal conclusions and arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 985 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the

truth of the allegations in Paragraph 985 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 986:** The allegations in Paragraph 986 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 2925.02(A) speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 986 characterizing the Code and to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 986 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 987:** The allegations in Paragraph 987 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 2925.02 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 987 characterizing the Code and to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 987 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 988:** The allegations in Paragraph 988 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 988 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 988 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 989:** The allegations in Paragraph 989 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 989 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 989 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 990:** The allegations in Paragraph 990 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies that it created a public nuisance and denies the remaining allegations in Paragraph 990 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 990 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 991:** The allegations in Paragraph 991 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations of misconduct alleged in the Complaint and denies the remaining allegations in Paragraph 991 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 991 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 992:** The allegations in Paragraph 992 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 992 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 992 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 993:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 993 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 994:** The allegations in Paragraph 994 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 994 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 994 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 995:** The allegations in Paragraph 995 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that Endo has created or is liable for any injury or public nuisance. Moreover, the Court limited the County of Summit's public nuisance claim to seeking injunctive relief, pursuant to its Opinion and Order of December 19, 2018.

**ANSWER TO PARAGRAPH 996:** Endo denies that Plaintiffs are entitled to any damages, equitable relief, or other relief from Endo. Moreover, the Court limited the County of Summit's public nuisance claim to seeking injunctive relief, pursuant to its Opinion and Order of December 19, 2018.

**ANSWER TO PARAGRAPH 997:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 998:** The allegations in Paragraph 998 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 998 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 998 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 999:** The allegations in Paragraph 999 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 999 to the extent they refer to Endo and its purported conduct.

**ANSWER TO PARAGRAPH 1000:** The allegations in Paragraph 1000 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1000 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1000 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1001:** The allegations in Paragraph 1001 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1001 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to

form a belief as to the truth of the allegations in Paragraph 1001 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1002:** The allegations in Paragraph 1002 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1002 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1002 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1003:** The allegations in Paragraph 1003 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1003 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1003 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1004:** The allegations in Paragraph 1004 of the Complaint contain legal conclusions and arguments that require no answer. Further, the Restatement (Second) of Torts § 821B speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1004 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1004 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1005:** The allegations in Paragraph 1005 of the Complaint and the Subparts thereto contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1005 and its Subparts to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1005 and its Subparts to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1006:** The allegations in Paragraph 1006 of the Complaint and the Subparts thereto contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1006 and its Subparts to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1006 and its Subparts to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1007:** The allegations in Paragraph 1007 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1007 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1007 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1008:** The allegations in Paragraph 1008 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a

further response is necessary, Endo denies the allegations in Paragraph 1008 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1008 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1009:** The allegations in Paragraph 1009 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 4729.35 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1009 characterizing the Code.

**ANSWER TO PARAGRAPH 1010:** The allegations in Paragraph 1010 of the Complaint contain legal conclusions and arguments that require no answer. Further, 21 U.S.C.A. § 823, 21 C.F.R. § 1301.74, R.C. § 4729.01(F), O.A.C. §§ 4729-9-12, 4729-9-16, and 4729-9-28 speak for themselves and no further response is necessary to Plaintiffs' characterization of them. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1010 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1010 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1011:** The allegations in Paragraph 1011 of the Complaint and the Subparts thereto contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1011 and its Subparts to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in

Paragraph 1011 and its Subparts to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1012:** The allegations in Paragraph 1012 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1012 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1012 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1013:** The allegations in Paragraph 1013 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1013 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1013 and denies them on that basis.

**ANSWER TO PARAGRAPH 1014:** The allegations in Paragraph 1014 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1014 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1014 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1015:** The allegations in Paragraph 1015 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a

further response is necessary, Endo denies the allegations in Paragraph 1015 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1015 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1016:** The allegations in Paragraph 1016 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 2925.02(A) speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1016 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1016 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1017:** The allegations in Paragraph 1017 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1017.

**ANSWER TO PARAGRAPH 1018:** The allegations in Paragraph 1018 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1018 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1018 and denies them on that basis.

**ANSWER TO PARAGRAPH 1019:** The allegations in Paragraph 1019 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a

further response is necessary, Endo denies the allegations in Paragraph 1019 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1019 and denies them on that basis.

**ANSWER TO PARAGRAPH 1020:** The allegations in Paragraph 1020 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1020.

**ANSWER TO PARAGRAPH 1021:** The allegations in Paragraph 1021 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1021 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1021 and denies them on that basis.

**ANSWER TO PARAGRAPH 1022:** The allegations in Paragraph 1022 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1022 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1022 and denies them on that basis.

**ANSWER TO PARAGRAPH 1023:** The allegations in Paragraph 1023 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1023.

**ANSWER TO PARAGRAPH 1024:** The allegations in Paragraph 1024 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1024 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1024 and denies them on that basis.

**ANSWER TO PARAGRAPH 1025:** The allegations in Paragraph 1025 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1025 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1025 and denies them on that basis.

**ANSWER TO PARAGRAPH 1026:** The allegations in Paragraph 1026 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies that it created a public nuisance and denies the remaining allegations in Paragraph 1026 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1026 and denies them on that basis.

**ANSWER TO PARAGRAPH 1027:** The allegations in Paragraph 1027 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations of misconduct in the Complaint and denies the remaining allegations in Paragraph 1027 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1027 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1028:** The allegations in Paragraph 1028 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1028 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1028 and denies them on that basis.

**ANSWER TO PARAGRAPH 1029:** Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1029 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 1030:** The allegations in Paragraph 1030 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1030 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1030 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1031:** The allegations in Paragraph 1031 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1031 and denies them on that basis.

**ANSWER TO PARAGRAPH 1032:** The allegations in Paragraph 1032 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1032 and denies them on that basis.

**ANSWER TO PARAGRAPH 1033:** The allegations in Paragraph 1033 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1033 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1033 and denies them on that basis.

**ANSWER TO PARAGRAPH 1034:** The allegations in Paragraph 1034 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1034 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1034 and denies them on that basis.

**ANSWER TO PARAGRAPH 1035:** The allegations in Paragraph 1035 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1035 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1035 and denies them on that basis.

**ANSWER TO PARAGRAPH 1036:** The allegations in Paragraph 1036 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1036 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1036 and denies them on that basis.

**ANSWER TO PARAGRAPH 1037:** The allegations in Paragraph 1037 of the Complaint contain legal conclusions and arguments that require no answer. Further, R.C. § 2307.71 speaks for itself and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1037 characterizing the Code.

**ANSWER TO PARAGRAPH 1038:** The allegations in Paragraph 1038 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies that Plaintiffs are entitled to any relief whatsoever.

**ANSWER TO PARAGRAPH 1039:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 1040:** The allegations in Paragraph 1040 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1040.

**ANSWER TO PARAGRAPH 1041:** The allegations in Paragraph 1041 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1041.

**ANSWER TO PARAGRAPH 1042:** The allegations in Paragraph 1042 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1042.

**ANSWER TO PARAGRAPH 1043:** The allegations in Paragraph 1043 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1043.

**ANSWER TO PARAGRAPH 1044:** The allegations in Paragraph 1044 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1044 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1044 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1045:** The allegations in Paragraph 1045 of the Complaint and the Subparts thereto contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1045 and its Subparts to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1045 and its Subparts to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1046:** The allegations in Paragraph 1046 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1046 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1046 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1047:** The allegations in Paragraph 1047 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1047 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1047 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1048:** The allegations in Paragraph 1048 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1048.

**ANSWER TO PARAGRAPH 1049:** The allegations in Paragraph 1049 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1049.

**ANSWER TO PARAGRAPH 1050:** The allegations in Paragraph 1050 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1050.

**ANSWER TO PARAGRAPH 1051:** The allegations in Paragraph 1051 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1051.

**ANSWER TO PARAGRAPH 1052:** The allegations in Paragraph 1052 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1052.

**ANSWER TO PARAGRAPH 1053:** The allegations in Paragraph 1053 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1053 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1053 and denies them on that basis.

**ANSWER TO PARAGRAPH 1054:** The allegations in Paragraph 1054 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1054.

**ANSWER TO PARAGRAPH 1055:** The allegations in Paragraph 1055 of the Complaint contain legal conclusions and arguments that require no answer. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1055 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 1055 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1056:** The allegations in Paragraph 1056 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo admits that it has marketed and sold prescription opioids, which have been regulated as controlled substances. Endo further admits that opioids expose users to the risk of addiction. Except as expressly admitted, Endo denies the allegations in Paragraph 1056 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1056 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1057:** The allegations in Paragraph 1057 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1057 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1057 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1058:** The allegations in Paragraph 1058 of the Complaint contain legal conclusions or arguments that require no answer. Further, the cited statutes speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 1058 of the Complaint characterizing the cited statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1058 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1059:** The allegations in Paragraph 1059 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1059 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1059 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1060:** The allegations in Paragraph 1060 of the Complaint contain legal conclusions or arguments that require no answer. Further, the cited statutes speak for themselves, and no further response is necessary to Plaintiffs' characterization of them. To the extent that an answer is required, Endo denies the allegations in Paragraph 1060 of the Complaint characterizing the cited statutes and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1060 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1061:** The allegations in Paragraph 1061 of the Complaint and all subparts thereto contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1061 and all subparts thereto with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1061 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1062:** The allegations in Paragraph 1062 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an

answer is required, Endo denies the allegations in Paragraph 1062 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1062 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1063:** The allegations in Paragraph 1063 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1063 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1063 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1064:** The allegations in Paragraph 1064 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1064 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1064 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1065:** The allegations in Paragraph 1065 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations of misconduct in the Complaint and denies the remaining allegations in Paragraph 1065 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1065 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1066:** The allegations in Paragraph 1066 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1066 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1066 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1067:** The allegations in Paragraph 1067 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1067 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1067 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1068:** The allegations in Paragraph 1068 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1068 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1068 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1069:** The allegations in Paragraph 1069 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1069 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 1069 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1070:** The allegations in Paragraph 1070 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1070 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1070 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1071:** The allegations in Paragraph 1071 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent that an answer is required, Endo denies that Plaintiffs are entitled to any damages or other relief, including the relief requested in Paragraph 1071, from Endo.

**ANSWER TO PARAGRAPH 1072:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 1073:** The allegations in Paragraph 1073 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1073 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1073 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1074:** The allegations in Paragraph 1074 of the Complaint and all subparts thereto contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1074 and all subparts thereto with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1074 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1075:** The allegations in Paragraph 1075 of the Complaint and all subparts thereto contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1075 and all subparts thereto with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1075 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1076:** The allegations in Paragraph 1076 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1076 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1076 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1077:** The allegations in Paragraph 1077 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1077 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 1077 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1078:** The allegations in Paragraph 1078 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1078 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1078 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1079:** The allegations in Paragraph 1079 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1079 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1079 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1080:** The allegations in Paragraph 1080 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1080 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1080 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1081:** The allegations in Paragraph 1081 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an

answer is required, Endo denies the allegations in Paragraph 1081 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1081 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1082:** The allegations in Paragraph 1082 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1082 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1082 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1083:** The allegations in Paragraph 1083 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1083 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1083 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1084:** The allegations in Paragraph 1084 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1084 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1084 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1085:** The allegations in Paragraph 1085 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1085 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1085 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1086:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1086 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 1087:** The allegations in Paragraph 1087 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1087 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1087 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1088:** The allegations in Paragraph 1088 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1088 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1088 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1089:** The allegations in Paragraph 1089 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent that an answer is required, Endo denies that Plaintiffs are entitled to any damages or other relief, including the relief requested in Paragraph 1089, from Endo.

**ANSWER TO PARAGRAPH 1090:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 1091:** R.C. § 2307.60(A)(1) speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent a further response is necessary, Endo denies the allegations in Paragraph 1091 characterizing it.

**ANSWER TO PARAGRAPH 1092:** The allegations in Paragraph 1092 of the Complaint contain legal conclusions or arguments that require no answer. Further, R.C. § 2925.02(A) speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 1092 of the Complaint characterizing R.C. § 2925.02(A) and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1092 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1093:** The allegations in Paragraph 1093 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1093 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 1093 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1094:** The allegations in Paragraph 1094 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1094 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1094 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1095:** The allegations in Paragraph 1095 of the Complaint contain legal conclusions or arguments that require no answer. Further, R.C. § 2925.02 speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 1095 of the Complaint characterizing R.C. § 2925.02 and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1095 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1096:** The allegations in Paragraph 1096 of the Complaint contain legal conclusions or arguments that require no answer. Further, R.C. § 2925.02(A)(2) speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 1096 of the Complaint characterizing R.C. § 2925.02(A)(2) and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 1096 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1097:** The allegations in Paragraph 1097 of the Complaint contain legal conclusions or arguments that require no answer. Further, R.C. § 2925.03(A)(2) speaks for itself, and no further response is necessary to Plaintiffs' characterization of it. To the extent that an answer is required, Endo denies the allegations in Paragraph 1097 of the Complaint characterizing R.C. § 2925.03(A)(2) and denies the allegations with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1097 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1098:** The allegations in Paragraph 1098 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1098 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1098 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1099:** The allegations in Paragraph 1099 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1099 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1099 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1100:** The allegations in Paragraph 1100 of the Complaint contain legal conclusions or arguments that require no answer.

**ANSWER TO PARAGRAPH 1101:** The allegations in Paragraph 1101 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1101 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1101 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1102:** The allegations in Paragraph 1102 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1102 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1102 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1103:** The allegations in Paragraph 1103 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1103 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1103 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1104:** The allegations in Paragraph 1104 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an

answer is required, Endo denies the allegations in Paragraph 1104 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1104 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1105:** The allegations in Paragraph 1105 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1105 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1105 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1106:** The allegations in Paragraph 1106 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1106 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1106 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1107:** The allegations in Paragraph 1107 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent that an answer is required, Endo denies that Plaintiffs are entitled to any damages or other relief, including the relief requested in Paragraph 1107, from Endo.

**ANSWER TO PARAGRAPH 1108:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 1109:** The allegations in Paragraph 1109 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1109 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1109 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1110:** The allegations in Paragraph 110 of the Complaint contain legal conclusions or arguments that require no answer.

**ANSWER TO PARAGRAPH 1111:** The allegations in Paragraph 1111 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1111 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1111 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1112:** Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1112 of the Complaint and denies them on that basis.

**ANSWER TO PARAGRAPH 1113:** Endo denies the allegations in Paragraph 1113 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1113 of the Complaint to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1114:** The allegations in Paragraph 1114 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1114 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1114 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1115:** The allegations in Paragraph 1115 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1115 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1115 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1116:** The allegations in Paragraph 1116 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1116 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1116 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1117:** The allegations in Paragraph 1117 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1117 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 1117 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1118:** The allegations in Paragraph 1118 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1118 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1118 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1119:** The allegations in Paragraph 1119 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1119 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1119 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1120:** The allegations in Paragraph 1120 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1120 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1120 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1121:** The allegations in Paragraph 1121 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent

that an answer is required, Endo denies that Plaintiffs are entitled to any damages or other relief, including the relief requested in Paragraph 1121, from Endo.

**ANSWER TO PARAGRAPH 1122:** Endo restates its answer to every allegation set forth above as though fully set forth herein.

**ANSWER TO PARAGRAPH 1123:** The allegations in Paragraph 1123 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1123 of the Complaint.

**ANSWER TO PARAGRAPH 1124:** The allegations in Paragraph 1124 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1124 of the Complaint.

**ANSWER TO PARAGRAPH 1125:** The allegations in Paragraph 1125 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1125 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1125 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1126:** The allegations in Paragraph 1126 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1126 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 1126 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1127:** The allegations in Paragraph 1127 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1127 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1127 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1128:** The allegations in Paragraph 1128 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1128 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1128 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1129:** The allegations in Paragraph 1129 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1129 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1129 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1130:** The allegations in Paragraph 1130 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an

answer is required, Endo denies the allegations in Paragraph 1130 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1130 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1131:** The allegations in Paragraph 1131 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1131 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1131 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1132:** The allegations in Paragraph 1132 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1132 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1132 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1133:** The allegations in Paragraph 1133 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations of misconduct alleged in the Complaint and denies the remaining allegations in Paragraph 1133 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 1133 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1134:** The allegations in Paragraph 1134 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1134 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1134 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1135:** The allegations in Paragraph 1135 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo denies the allegations in Paragraph 1135 with respect to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1135 to the extent they refer to other defendants and denies them on that basis.

**ANSWER TO PARAGRAPH 1136:** The allegations in Paragraph 1136 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent that an answer is required, Endo denies that Plaintiffs are entitled to any damages or other relief, including the relief requested in Paragraph 1136, from Endo.

#### **PRAYER FOR RELIEF**

**ANSWER TO PARAGRAPH 1137:** Endo denies that Plaintiffs are entitled to any damages or other relief, including the relief requested in Subparts (a) through (l) of Paragraph 1137, from Endo.

## **DEFENSES**

Without assuming any burden of proof that it would not otherwise bear, Endo hereby asserts the following separate and additional affirmative defenses to the allegations and claims in the Complaint. All of the following defenses are pleaded in the alternative and none constitute an admission that Endo is in any way liable to Plaintiffs, that Plaintiffs have been or will be injured or damaged in any way, or that Plaintiffs are entitled to any relief whatsoever.

Endo further incorporates by reference any defenses applicable to it that are asserted by any other Defendant as if fully set forth herein. Endo reserves the right to assert other defenses as this action proceeds or amend its Answer and hereby gives notice that it may further supplement the facts regarding its currently pleaded defenses, based on information that may become available or apparent during the discovery proceedings in this matter.

As a defense to the Complaint and each and every allegation contained therein, Endo asserts:

1. Failure to State A Claim. The Complaint fails to allege sufficient facts to state a claim upon which relief can be granted, and fails to plead a legally cognizable injury.
2. Failure to Plead With Requisite Particularity. Plaintiffs have not pled fraud with the required particularity, including under Federal Rule of Civil Procedure 9(b).

3. Statute of Limitations and Laches. The claims are barred in whole or part by the applicable statute of limitations and/or the equitable doctrine of laches. Each of Plaintiffs' claims is subject to a statute of limitations, and the longest applicable limitations period is five years.

*See, e.g., O.R.C. § 2923.34(J).* Plaintiffs' claims are based largely on alleged acts or omissions that occurred long before any applicable limitations period and thus are time-barred.

4. Failure to Join Necessary or Indispensable Parties. Plaintiffs have failed to join one or more necessary and indispensable parties, including without limitation healthcare providers, prescribers, patients, government agencies, and other third parties who have engaged in, or failed to reasonably prevent, unauthorized or illicit prescribing, dispensing, diversion, or use of prescription opioid medications or illicit drugs.

5. Preemption. Plaintiffs' claims are barred because they are preempted by federal law and regulation, including by the U.S. Food, Drug, and Cosmetic Act, the regulations promulgated pursuant thereto, and the Supremacy Clause of the United States Constitution. To the extent the Plaintiffs' claims are based on alleged misrepresentations made to the U.S. Food and Drug Administration ("FDA"), such claims are barred pursuant to *Buckman Co. v. Plaintiff's Legal Committee*, 531 U.S. 341 (2001).

6. Preemption (Generics). Any claims pertaining to generic opioid medications are preempted. See *PLIVA, Inc. v. Mensing*, 564 U.S. 604 (2011); *Mutual Pharmaceuticals Co. v. Bartlett*, 570 U.S. 472 (2013).

7. Lawful Activity. The opioid medications at issue were manufactured, distributed, and labeled in accordance with the provisions of federal law including the U.S. Food, Drug, and Cosmetic Act and the regulations promulgated pursuant thereto. Endo's conduct conformed with the U.S. Food, Drug, and Cosmetic Act, the requirements of the FDA, the Controlled Substances Act, and the requirements of the Drug Enforcement Agency. Moreover, the activities alleged conformed with all state and federal statutes, regulations, and industry standards based upon the state of knowledge existing at the relevant time(s) alleged.

8. Proper Labeling Subject to FDA Review and Approval. Statements in branded or unbranded materials comporting with FDA-approved uses are not misleading as a matter of law or otherwise actionable.

9. Primary Jurisdiction. Plaintiffs' claims are barred and/or this Court should defer this matter to the FDA, in whole or in part, pursuant to the doctrine of primary jurisdiction.

10. Separation of Powers. Plaintiffs' claims are barred or limited by the separation of powers doctrine.

11. Equitable Estoppel and/or Waiver. The doctrines of estoppel and/or waiver bar Plaintiffs' claims. The imposition of injunctive relief and/or civil penalties would be inequitable, particularly in light of Endo's lawful and proper sale of opioid medications that are heavily regulated and include FDA-approved labeling.

12. Truthful and Non-Misleading Statements. The representations or statements alleged to have been made were true and accurate at the time made and/or otherwise were made in good faith, with a reasonable belief as to their validity and accuracy and with a reasonable belief that all conduct was lawful.

13. First Amendment and Related Doctrines. Plaintiffs' claims are barred, in whole or in part, by applicable provisions of the United States Constitution and the Constitution of Ohio, including but not limited to the First Amendment to the United States Constitution and Article I, § 11 of the Constitution of Ohio, and applicable provisions of any other state whose laws may apply.

14. Learned Intermediary Doctrine. Plaintiffs' claims are barred by the learned intermediary doctrine. The products at issue are prescribed and dispensed by physicians and other healthcare providers and their agents who used their informed, independent medical judgment in making prescribing decisions for a given patient.

15. Sophisticated User Doctrine. Plaintiffs' claims are barred by the sophisticated user doctrine. Because of their training and experience, health care providers who prescribe opioid medications know or reasonably should know of the potential risks, and Endo had no duty to warn and cannot be held liable for failing to warn of risks and complications of which members of the relevant medical community knew or should have known.

16. Informed Consent. The healthcare providers who prescribe FDA-approved opioid medications have a duty to provide patients with material information so they can make informed decisions about a proposed treatment, and Endo is entitled to rely on this duty—as well as healthcare providers' professional education, training and experience with respect to potential risks and complications associated with opioid medications. Because healthcare providers were provided with adequate warnings, Endo is entitled to rely on healthcare providers' provision of information to patients. Plaintiffs' claims thus are barred by patients' provision of informed consent.

17. Abrogation. Plaintiffs' common law and public nuisance claims have been abrogated by the Ohio Products Liability Act.

18. Lack of Criminal Conviction. Plaintiffs' alleged injury through criminal acts claims fails because there has been no relevant criminal conviction.

19. Ratification and Voluntary Payment. Plaintiffs' alleged loss, damage, injury, harm, or expense, if any, was caused in whole or in part by Plaintiffs' ratification of any alleged misconduct, including under the voluntary payment doctrine.

20. Assumption of the Risk, Contributory Negligence, and Open and Obvious Danger Doctrines. The claims set forth in the Complaint are barred, in whole or in part, by the doctrines of assumption of risk, contributory negligence, and open and obvious danger. Prescription opioid products have associated known risks that can be unavoidable even within the scope of prescribed and intended use, but are reasonable in comparison to the benefits conferred. The risks of opioid medications, and the alleged incurred costs and/or injuries purportedly caused by opioid medications, were known and disclosed to Plaintiffs, Plaintiffs' contractors and agents, Ohio consumers, and prescribing healthcare providers for years.

21. Failure to Monitor or Mitigate. Plaintiffs have failed to take appropriate and necessary steps to mitigate any alleged damages. Among other things, they continued to permit use of, approve, or pay for opioid medications, either directly or through authorized third parties, without further inquiry into the necessity of the medication and, while aware of the risks of opioid medications, they failed to take adequate steps to monitor or limit any alleged wrongful prescribing, distribution, or use.

22. State of the Art. Plaintiffs may not recover because the methods, standards, or techniques of designing, manufacturing, labeling and distributing the prescription opioid medications at issue complied with and were in conformity with the generally recognized state of the art at the time the products were designed, manufactured, labeled, and distributed.

23. Speculative and Remote Injuries. The alleged injuries asserted by Plaintiffs are too speculative, derivative, and/or remote from the alleged wrongful conduct to be a basis for liability as a matter of law and due process.

24. Intervening and Superseding Causes. The alleged misconduct was not the but-for, proximate, or legal cause of purported injuries, harm, or damages and/or Plaintiffs' injuries, if any, were the result of superseding and/or intervening causes, including but not limited to the criminal acts of third parties, over which Endo had no control. Moreover, the claims set forth in the Complaint are barred because the purported injuries, harm, or damages (if any) were caused, in whole or in part, by Plaintiffs' own conduct, and/or that of its contractors or agents, which constitutes superseding and intervening cause(s).

25. No reliance. Neither the patients prescribed opioid medications nor their prescribers relied to their detriment upon any lawful statement in determining to use the medications at issue.

26. Opinion. To the extent Plaintiffs seek to impose liability for broad, general statements regarding the value or quality of products that were made to and reasonably understood by providers as opinion, such statements cannot constitute false representations as a matter of law.

27. Medical Necessity. Plaintiffs fail to plead and cannot establish that they incurred any costs, or that any alleged injury was caused as a result of, any opioid prescription promoted or sold by Endo and that was medically inappropriate or should not have been written, or that any allegedly improper conduct caused any health care provider to write any unnecessary, ineffective or harmful opioid prescriptions.

28. Standing. Plaintiffs lack standing to bring their claims and to obtain the relief they seek, including their RICO claims. Plaintiffs lack standing, among other reasons, under the “statewide concern doctrine.” *See Reading v. Pub. Util. Comm ’n*, 846 N.E.2d 840, 846 (Ohio 2006) (a “municipality may not, in the regulation of local matters, infringe on matters of general and state-wide concern”); *Am. Fin. Servs. Ass ’n v. Cleveland*, 858 N.E.2d 776, 781 (Ohio 2006) (“where matters of statewide concern are at issue, the state retains the power . . . to address those matters”).

29. Unique Reactions. Plaintiffs’ purported injuries, harm, or damages (if any), were the result of pre-existing conditions or idiosyncratic reactions to medications and/or occurred by operation of nature or as result of circumstances over which Endo had and continues to have no control.

30. Misuse of Products. Plaintiffs’ claims are barred, in whole or in part, by the alteration, modification, illicit and/or illegal use or misuse by third parties of the opioid medications at issue.

31. Commerce and Dormant Commerce Clause. Plaintiffs’ claims are barred, in whole or in part, by the Commerce Clause of the United States Constitution.

32. Due Process and Ex Post Facto. Plaintiffs’ claims are barred because they violate procedural and substantive due process rights under the Fourteenth Amendment to the U.S. Constitution and Article I, § § 1, 2, 16, and 19 of the Constitution of Ohio, and the right to be free from retroactive or ex post facto laws as guaranteed by Article I, § 10 of the United States Constitution and Article II, § 28 of the Constitution of Ohio.

33. Improper Financial Arrangement. Endo's rights to fair process (including under the Due Process Clause of the U.S. Constitution and Article II, §§ 1, 2, 16, and 19 of the Constitution of Ohio) are violated by any financial or other arrangement that might distort a government attorney's duty to pursue justice rather than his or her personal interests, financial or otherwise, in the context of a civil enforcement proceeding, including by any use by Plaintiffs of a private contingency fee counsel in this action.

34. Municipal Services Doctrine. Plaintiffs' claims are barred, in whole or part, by the free public services doctrine and/or municipal cost recovery rule. Plaintiffs are not entitled to recover governmental expenditures as a matter of law.

35. Police Powers. Plaintiffs' claims and alleged damages are barred, in whole or in part, by common law, statutory, and state constitutional constraints on the exercise of police powers by a municipality.

36. Economic Loss Doctrine. Plaintiffs' claims are barred or limited by the economic loss rule.

37. No Benefit from Plaintiffs. Plaintiffs' claim for unjust enrichment is barred or limited because Endo did not receive and retain any alleged benefit from Plaintiffs.

38. Subrogation. Plaintiffs have failed to comply with the requirement that they identify each patient in whose claim(s) they have a subrogation interest.

39. Double Recovery. Plaintiffs' claims are barred, in whole or in part, to the extent they seek to recover any damages, restitution, costs, or other payments that have been reimbursed, paid, or borne by other persons or entities. Any verdict of judgment that might be recovered must be reduced by those amounts that already have been or will in the future, with reasonable certainty, be paid to Plaintiffs by others or indemnify Plaintiffs.

40. Set-off. Endo is entitled to a credit, set-off, or offset for all sums of money received or available from or on behalf of any tortfeasor(s) for the same injuries alleged in Plaintiffs' Complaint, including but not limited to any and all settlements Plaintiff may reach with any tortfeasor(s).

41. Comparative Fault. To the extent that Plaintiffs' alleged injuries, harm, and/or damages were proximately caused or contributed to by Plaintiffs' own conduct or the conduct of others, Endo is entitled to an individual assessment of fault for each party alleged to have caused any injury, harm, or damage to Plaintiffs. *See also*, Ohio Revised Code § 2307.23.

42. Several Liability and Allocation. Endo's alleged liability, if any, must be limited in accordance with the percentage of fault allocated to it by the ultimate trier of fact and/or law. Each defendant may only be severally liable for any injuries or expenses. Plaintiffs' alleged damages are not indivisible but comprise separate and discrete costs.

43. Failure of Exemplary Damages / Excessive Fines Violation. Plaintiffs' claims for punitive damages, statutory damages, civil penalties, and other relief are prohibited under the Fifth, Eighth, and Fourteenth Amendments of the United States Constitution, and Article I, §§ 1, 2, 9, 10, 16, and 19 of the Constitution of Ohio. Plaintiffs' claims for punitive damages, statutory damages, civil penalties, and other relief:

- a. have no basis in law or fact;
- b. are not recoverable because the Complaint's allegations are legally insufficient to support or allow the imposition of punitive damages, statutory damages, civil penalties, or other relief against Endo consistent with the United States Constitution or the Constitution of Ohio or Ohio Law;

- c. cannot be sustained because the laws setting forth the standard(s) for determining liability for, and the amount(s) of, punitive damages, statutory damages, civil penalties, or other relief fail to give Endo prior notice of the conduct for which punitive damages, civil penalties, or other relief may be imposed and the severity of the penalty that may be imposed, and are void for vagueness in violation of Endo's due process rights guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution and by Article I, §§ 1, 2, 10, 16, and 19 of the Constitution of Ohio;
- d. cannot be sustained because any award of punitive damages, statutory damages, civil penalties, or other relief exceeding the limits authorized by law would violate Endo's due process and equal protection rights guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution and by Article I, §§ 1, 2, 10, 16, and 19 of the Constitution of Ohio and would be improper under the laws or common law of Ohio;
- e. cannot be sustained because an award of punitive damages, statutory damages, civil penalties, or other relief in this case, combined with any prior, contemporaneous, or subsequent judgments against Endo for punitive damages, civil penalties, or other relief arising from the distribution, supply, marketing, sale, promotion, or use of Endo's products would constitute constitutionally impermissible multiple punishments for the same wrong and double jeopardy under the Fifth Amendment to the United States Constitution and by Article I, § 10 of the Constitution of Ohio;

- f. cannot be sustained because any award of punitive damages, statutory damages, civil penalties, or other relief without the apportionment of the award separately and severally between or among the alleged joint tortfeasors, as determined by the percentage of the wrong(s) allegedly committed by each tortfeasor, would violate Endo's due process and equal protection rights guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution and by Article I, §§ 1, 2, 10, 16, and 19 of the Constitution of Ohio; and
- g. cannot be sustained because subjecting Endo to punitive damages, statutory damages, civil penalties, or other relief that is penal in nature without the same protections accorded to criminal defendants would violate Endo's rights guaranteed by, *inter alia*, the Fourth, Fifth, Sixth, and Fourteenth Amendments to the United States Constitution and by Article I, §§ 1, 2, 5, 10, 14, 16, and 19 of the Constitution of Ohio.

44. Failure of Restitution or Rescission. Plaintiffs are not entitled to any relief in the form of restitution or rescission because they cannot restore the *status quo ante*.

45. Capped Damages. The damages to which Plaintiffs may be entitled to recover if liability is established (which liability is specifically denied) are capped, including pursuant to Ohio Revised Code. See, e.g., Ohio Revised Code §§ 2315.18 and 2315.21.

46. Agency Deference. Plaintiffs' claims are barred, in whole or in part, by the deference that common law gives to discretionary actions by the FDA under the FDCA.

47. Adequate Remedy at Law. To the extent Plaintiffs attempt to seek equitable relief, Plaintiffs are not entitled to such relief because they have an adequate remedy at law and cannot otherwise satisfy the elements for equitable relief.

48. No Public Right. Plaintiffs' public nuisance claims are barred or limited because, among other reasons, (i) no action of Endo involved interference with real property; (ii) illegal conduct perpetrated by third-parties involving the use of a legal product does not involve a public right against a manufacturer sufficient to state a claim for public nuisance; (iii) the alleged public nuisance would have impermissible extraterritorial reach; and (iv) Endo's alleged wrongful conduct is too remote from the alleged "public" injury as a matter of law and due process.

49. Unconstitutionally Vague. The Ohio public nuisance statute is unconstitutionally vague.

50. Unclean Hands. Plaintiffs are barred from recovering, in whole or in part, by the doctrine of unclean hands. Should discovery show that Plaintiffs or their agents acted inequitably in responding to the alleged harms, such conduct should be taken into account in assessing Plaintiffs' claims and whether, and to what extent, they are entitled to relief in this action.

51. Failure to Comply with Case Management Orders. Plaintiffs' claims are barred and should be dismissed under Fed. R. Civ. P. 41(b) and any other applicable rules because Plaintiffs have failed to comply with the Court's case management orders, including CMO-1, and refused to identify the allegedly inappropriate, unnecessary, or otherwise improper opioid prescriptions that they contend are at issue and on which they base their claims.

**JURY DEMAND**

Endo requests a trial by jury on all issues so triable.

**PRAYER FOR RELIEF**

WHEREFORE, Endo prays as follows:

1. That Plaintiffs take nothing by the Complaint;
2. That the Complaint be dismissed with prejudice;
3. That Endo recovers its attorneys' fees and its costs; and
4. For such other and further legal and equitable relief as the Court may deem just and proper.

*Respectfully submitted,*

Dated: January 15, 2019

/s/ Jonathan L. Stern

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*Attorneys for Endo Health Solutions Inc. and  
Endo Pharmaceuticals Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15<sup>th</sup> day of January, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. The foregoing will be served on counsel of record.

/s/ Jonathan L. Stern

Jonathan L. Stern

*Attorney for Endo Health Solutions Inc. and  
Endo Pharmaceuticals Inc.*